

# EXHIBIT A

Plaintiffs allege the following upon information and belief. Plaintiffs reserve the right to amend this pleading following discovery.

	Date	Mode of Communication and Locations	Participants	Details
F1	2003	Electronic mail, telephone or fax (wires) between Mumbai, India, and Kerala, India	Sachin Dewan or representatives of Dewan Consultants to Representatives of the <i>Malayala Manorama</i> .	Transmission of advertisement to <i>Malayala Manorama</i> indicating offer of an opportunity for work-based permanent residence in the United States.
F2	2002	Newspaper ad	Abraham Varghese, Dewan Consultants	A. Varghese saw an ad stating that there was an opportunity to get a green card in the United States. The ad had a phone number for Dewan Consultants.
F3	2002	Telephone	A. Varghese, Sachin Dewan	After viewing the ad, A. Varghese called the number and reached Sachin Dewan, of Dewan Consultants. He said to call the local representative.
F4	2002	Telephone	A. Varghese, Salimon, Indo-Amerisoft, Rao	A. Varghese called the local representative, a man named Salimon. Salimon informed A. Varghese that to take advantage of this opportunity, he would pay three installments. Once he was in the United States, the company would extend his visa three times and then process his green card. This opportunity was for Indo-Amerisoft, and the client contact for that company was Mr. Rao.
F5	2002	In-person meeting	A. Varghese, Salimon	A. Varghese went to a conference at a hotel, at 2 p.m. At the conference, Salimon told them that there were three installments and a contract that they all had to sign. They were promised that once they made it to the U.S., their visa would be extended three times and then they would get a green card.
F6	2002	Payment	A. Varghese, Salimon	A. Varghese signed the contract with Salimon and paid the first installment.
F7	November, 2002	Newspaper ad, Kochi, India	Joy Kallachiyil Varkey	Varkey saw an ad in the <i>Malayala Manorama</i> which said that J&M was hiring workers in the United States and that workers would be able to get green cards for themselves and their families. The ad was from Dewan Consultants.

F8	December, 2002	In-person meeting, Kottayam, India, Salimon’s office at Aravind Travels	Salimon, Varkey	Varkey went to Salimon’s office at Aravind Travels. Salimon told Varkey that he was a recruiter for Dewan Consultants. He said a green card family visa would cost 5.75 Lakhs, payable in three installments. Salimon told Varkey that he would be able to start working in the United States within two years, by 2004.
F9	2003	Electronic mail, telephone or fax (wires) between Mumbai, India, and Dubai, United Arab Emirates (UAE)	Sachin Dewan or representatives of Dewan Consultants d/b/a Medtech Consulting and Dewan Consultants to Representatives of the <i>Gulf News</i>	Transmission of advertisement to Gulf News indicating offer of an opportunity for work-based permanent residence in the United States.
F10	2003	Electronic mail, telephone or fax (wires) between Mumbai, India, and Kerala, India	Gijo John, Sachin Dewan, representatives of Dewan Consultants, or Indo-Amerisoft to Representatives of the <i>Malayala Manorama</i> .	Transmission of advertisement to <i>Malayala Manorama</i> indicating offer of an opportunity for work-based permanent residence in the United States, which was read by John.
F11	2003	Newspaper ad	Biju Pottirayil, J&M Consulting	Pottirayil saw an ad in the Malayala Manorama while in India for a wedding; the ad stated that J&M Consulting was hiring, that you could go to the United States in 12 months, and that there was a meeting scheduled at a hotel in Kochi.
F12	2003	In person, Dubai	Surje Tamang, S. Dewan, Rao	Tamang learned from a friend about an advertisement in a magazine from Abu Dhabi regarding opportunities to work and live in the United States. The advertisement said there would be a meeting. At the meeting, Tamang was told that if he was interested, he should visit Dewan’s office in Dubai. Tamang went to Dubai to meet with Sachin Dewan, his father, and Rao. S. Dewan said if Tamang paid fees, he would receive a green card.
F13	2003	Newspaper ad, UAE	Biju Mukrukkattu Joseph	B. Joseph saw an ad for Dewan Consultants in Dubai while working in UAE.
F14	2003	Newspaper ad, Ras al-Khaimah, UAE	Babu Mali, Dewan	Mali saw an advertisement for migration opportunities for shipyard and skilled workers to the U.S.A., on permanent residency/green card that stated interested applicants should contact Medtech Solutions FZE LLC.

F15	2003	Telephone	Mali, unidentified woman,	Mali telephoned the Medtech Solutions office 2-3 days after seeing the advertisement and spoke with an unidentified woman.
F16	2003	Newspaper ad	Haridas Sanakara Panicker	Panicker saw an ad for Dewan Consultants in Abu Dhabi <i>Gulf News</i> .
F17	2003	In person meeting	Panicker, Sachin Dewan, Salimon	Panicker attended interview with Dewan, was told if he worked for 18 months he would obtain a green card.
F18	2003	Newspaper ad	Bijay Kumar Biswas	In 2003, when Biswas was working for ESMA in Dubai, he saw an ad in <i>Gulf News</i> newspaper. The ad offered green cards for pipe-fitters and welders.
F19	2003	Newspaper ad; information from friends; Kerala; Dubai	Varghese Yohannan Kainikkeril; Indo-Amerisoft	Kainikkeril saw an ad in a Kerala newspaper, the <i>Malayala Manorama</i> , for Indo-Amerisoft. He got information about the ad from friends while working in Dubai.
F20	2003	Telephone	Kainikkeril; Sachin Dewan; Indo-Amerisoft	After seeing the ad for Indo-Amerisoft; Kainikkeril contacted the Dewan office. He was told that he would get a visa renewal and a green card.
F21	2003	In-person meeting; Kochi	Kainikkeril; Sachin Dewan; Indo-Amerisoft	Kainikkeril attended an in-person meeting at a hotel in Kochi, along with approximately 30 other prospective workers, during which Sachin Dewan promised that they would be able to get green cards.
F22	2003	In-person meeting; Kochi	Kainikkeril; Indo-Amerisoft; Sachin Dewan	Kainikkeril was made to undergo a skills test. When he passed, he was promised a salary of \$18 per hour.
F23	2003	Newspaper ad	Sebastian George Pananjikal	Pananjikar saw an ad in a newspaper (Malayalam Manorama) offering to provide a process for a permanent green card and arrange to bring his family.
F24	2003	In person meeting	Pananjikar, Salomin	Pananjikar was approached by Salomin and told that Dewan was doing interviews at a hotel.
F25	2003	In person meeting at hotel	Pananjikar, Pol, Burnett	Pananjikar and his son were told that if they paid 8 lakhs, they would get 6-month temporary visas which would lead to permanent work Visas that would allow them to work in the U.S.
F26	2003	Payment to Malvern Burnett	Pananjikar, Dewan	Pananjikar made his first payment of 1.75 lakhs was made after interview in 2003.

F27	2003	Newspaper ad, UAE	Biju Mukrukkattu Joseph	Joseph saw an ad for Dewan Consultants in Dubai while working in UAE.
F28	Approx. 2003	Telephone	A. Varghese, Salimon	After several months, a call came to A. Varghese's home in India about the second installment. He was told to call Salimon.
F29	Approx. 2003	Telephone	A. Varghese, Salimon	A. Varghese called Salimon and told him that he was working in Dubai. Salimon told him that they had an office in Dubai, and that A. Varghese could pay the second installment there. A. Varghese then told Salimon that he did not have the money for the second installment.
F30	Approx. 2003	Telephone	A. Varghese, Sachin Dewan	When Sachin Dewan found out that A. Varghese did not have the money for the second installment, he called A. Varghese. Sachin Dewan said that A. Varghese did not have to pay right away, but could pay both amounts with the third installment.
F31	January, 2003	In-person meeting, Island Hilton Hotel in Ernakulum, India	Burnett, Pol, Sachin Dewan and Salimon, along with Varkey and other prospective workers (including Varkey's English-speaking cousin)	Salimon, translating into Malayalam for Sachin (who spoke Hindi), told the over 200 attendees that they would be working for J&M in the United States, that they would get green cards and be able to bring over their families. At this time it was stated that the cost would be 4.5 Lakhs but that later got increased to 5.75 Lakhs, in addition to payments required for medical tests, practical trade tests, visa interviews and travel. Pol told Varkey's cousin in English that this was a legitimate opportunity to work in the U.S. and get a green card. Sachin told the attendees they would have to pay the first installment of 1.5 Lakhs, split three ways (Pol and Burnett to be paid with the demand drafts, Dewan to be paid in cash in Rupees) by the end of January, 2003.
F32	May, 2003	In-person meeting, Hilton Hotel in Kochi, India	Sachin Dewan, Salimon, Burnett, Pol, Sachin's sister, Varkey and other workers	Varkey went to a meeting at the Hilton Hotel and noted that Sachin was surrounded by 30 Mafia-type body guards. There was lots of money changing hands. Varkey paid his first installment in demand drafts to Pol and Burnett, cash to Sachin.

F33	June or July 2003	Newspaper ad	Vasavan Babu	V. Babu saw an ad in the <i>Malayala Manorama</i> stating there was work available in the United States and the company was offering to process a green card or permanent residence card in the U.S. The ad further stated the work would pay \$19 per hour, food and accommodation would be free, there would be overtime paid at \$24 per hour and special overtime paid at \$54.50 per hour.
F34	August/September 2003	Newspaper ad	Vavachan Mathai Koottalil	Koottalil saw a newspaper advertisement in Dubai for an opportunity for shipyard workers to work in the United States.
F35	Fall 2003	In person	Koottalil, S. Dewan, Rao, Burnett	Koottalil met with S. Dewan, Rao, and Burnett. Koottalil was told that even if there was not shipyard work available, he could work as a taxi driver and that his wife could also come to the U.S. and work. He was told it would be an 18 month process and he would be able to bring his family. He was required to pay 45,000 Dirham in three installments.
F36	21-Nov-03	Newspaper ad, Dubai	Viswamithran Raghavan	Raghavan, while working in Abu Dhabi, saw an ad in the Malayalam newspaper. The Dewan Company was advertising on behalf of a shipyard company that would provide green cards (Indo-AmeriSoft, for Rao).
F37	Dec-03	Newspaper ad	George Arackal	Arackal saw Dewan Consultants ad for welding work in the United States in newspaper in Kochi, Kerala, India.
F38	Dec-03	Telephone	Arackal, Salimon	Arackal called the number in the ad and spoke with Salimon, who encouraged him to attend the meeting at the Trident Hotel in Kochi in January 2004.
F39	Late 2003	Newspaper ad, India	Ramachandran Murugaiyan	Murugaiyan saw an ad in a Tamil newspaper placed by Dewan Consultants which advertised the availability of construction jobs in the United States.
F40	Late 2003	In-person meeting, Mumbai	Murugaiyan, S. Dewan, Rao	In response to the ad, Murugaiyan called Dewan Consultants and then met S. Dewan and Rao in Mumbai. Dewan and Rao promised that Murugaiyan could receive a green card for work in the U.S. and be paid at \$18 per hour but he would be required to pay a total of 640,000 Indian Rupees in three installments.

F41	Late 2003	Newspaper ad	Dewan Consulting, J&M, Malvern Joseph Rodrigues	While working in Abu Dhabi, Rodrigues saw an ad in a newspaper from Dewan Consulting recruiting for J&M.
F42	Late 2003	In person meeting	V. Babu, Manish, Sachin, Rao	V. Babu went to an interview where he was told by Sachin and Rao that he would get a green card visa, that food and accommodations would be free, and that a green card for his family would also be provided. V. Babu was told he would need to pay 6 lakh rupees or 45,000 dirhams, in three equal installments
F43	Late 2003	In-person meeting, Dubai	Rodrigues, Sachin Dewan, Varuna, Dewan Consulting.	Dewan Consulting asked Rodrigues for \$20,000. Rodrigues was told by S. Dewan that he would get a green card for him and his family. Rodrigues did not have the money at the time so did not pay.
F44	Late 2003	Payments to Rao in Dubai	V. Babu, Rao	One week after meeting with Manish, Sachin, and Rao, V. Babu had a friend pay 15,000 dirhams to Rao; V. Babu pledged property in India to his friend who paid the first installment.
F45	Late 2003	In-person meeting, Dewan Consulting office in Dubai	S. Dewan, Rodrigues, M. Pol	At a second meeting at Dewan Consulting's office, Rodrigues was again promised a green card if he would pay \$20,000, but again he did not have the money so did not pay.
F46	Late 2003 or early 2004	In-person meeting in Kochi, India	John, Sachin Dewan, Dewan Consultants	At the Trident International, 40-50 potential Indian workers were informed of a possible work opportunity in the U.S. that included permanent residence. The Indian nationals, including John, were informed that the green card process would take up to 18 months and that the total payments would equal 500,000 rupees.
F47	2003 or 2004	Newspaper ad	Prabhakaran Balakrishna Pillai	Pillai saw an advertisement in <i>Malayala Manorama</i> for an opportunity to work in the United States.
F48	2003 or 2004	In-person meeting in Kochi	Pottirayil, Sachin Dewan, Salimon	Pottirayil attended a meeting at a hotel in Kochi with Sachin Dewan and Salimon. Pottirayil was told that he could go to the United States with his family; that he would receive a labor certificate; and that there would be green card processing.

F49	2003 or 2004	Telephone	Pottirayil, Salimon	After discussing the opportunity with his family, Pottirayil contacted Salimon about the opportunity. Salimon informed Pottirayil about an opportunity for another interview based on the timing of Michael Pol's arrival. Salimon told Pottirayil that he could not return to his job in Italy and that he would have to stay in India to take advantage of this opportunity.
F50	2003-2004	In-person meeting in Kochi; bank transactions	Kainikkeril; Sachin Dewan; Indo-Amerisoft	Kainikkeril made payments to Sachin Dewan, the first installment of which totaled 160,000 rupees. He was later told that the second installment was 340,000 rupees.
F51	2003-2004	In person meeting, Dubai	Biswas, Sachin Dewan	Biswas met with Sachin Dewan in Dubai in 2003. The process started in 2004. He thought he would be working for Indo-AmeriSoft.
F52	From December 2003 through in or around January 2004	Mails, or telephone, fax, and/ or electronic mail (wires) between New Orleans, Louisiana; Mumbai (Mumbai), India; and/or Dubai, UAE	Malvern C. Burnett, Law Offices of Malvern C. Burnett ("Burnett Law Offices"), Gulf Coast Immigration Law Center ("GCILC"), Kurella Rao, Indo-Amerisoft LLC, Sachin Dewan, and Dewan Consultants	Discussions and transmission of materials related to preparing for Dubai meeting and preparation of contracts and other paperwork to be signed at January 18, 2004 meeting. Specific information regarding these communications is currently in the sole possession of Defendants.
F53	2004	Newspaper ad	Joy Joseph Attayil	Attayil saw a Malayayalm language ad in a South Asian newspaper offering to provide a process for a permanent green card and arrange to bring his family.
F54	2004	In person meeting at Hotel	Attyail, Burnett, Sachin	Attayil went to an interview at a hotel; Burnett and Sachin told attendees the requirements were 3 years' experiences and qualifications through classes. He was told that he would be working for J&M.
F55	2004	Newspaper	Kannankutty Ponnann	Ponnann read a newspaper ad recruiting pipe welders, plater welders, pipe fitters, and structural fitters for work in the U.S. on a permanent residence green card.
F56	2004	Newspaper ad	John Charuvila George	George saw a newspaper ad regarding Dewan Consulting in the <i>Malayala Manorama</i> newspaper.
F57	2004	Newspaper ad	Suresh Kakkoth	Kakkoth saw an ad when he was working in Dubai in <i>Kalheej Times</i> newspaper. The ad said there was an opportunity to work in U.S. and get a green card.

F58	2004	In person meeting , Dewan Consulting office	Kakkoth, Dewan Consulting employee	Kakkoth went to Dewan Consulting's office and met with a woman who said that the recruiters were looking for workers with welding skills to work on a ship in the U.S. and that the workers would get a visa.
F59	2004	In person meeting	Kakkoth, Rao, Burnett, Dewan Consulting employee	Kakkoth went to a seminar. An American lawyer (Burnett) was there (with his assistant, an American woman); the boss of Dewan Consulting was there; and Rao was there. They requested 4,500.00 in Dubai currency. Kakkoth paid 4,500 dirhams in Dubai to Burnett and Rao (the first payment/installment was considered a processing fee). Dewan told Kakkoth that he would work for Indo-AmeriSoft and that he would be put on a fast track for a Visa that would allow him to live permanently in the U.S., with his family.
F60	2004	In person meeting in Kochi Kerala	George, Salimon, Michael Pol	George attended an interview with Salimon and Pol and was promised a green card within 18 months of arriving in the United States.
F61	2004	In person meeting at Dewan office, Dubai	George Mathew, Sachin Dewan	Mathew attended a seminar at Dewan's Dubai office. Dewan gave the presentation to about 500 people, who were given information about the required payments and told they would get green card processing
F62	2004	Payment to Kurella Rao	Mathew, Kurella Rao	Mathew paid 15,000 Dirhams to Rao.
F63	2004	Newspaper ad	Kunhikrishnan Veetil	Veetil read a newspaper in English ( <i>Gulf News</i> ) in Abu Dhabi. The advertisement noted that there would be arrangements for a green card to the United States. This was an advertisement for Dewan Consulting.
F64	2004	Newspaper ad	Shogy Vezhaparambil Ousephkutty	Ousephkutty saw a Dewan Agency ad in the <i>Times of India</i> newspaper.

F65	2004	Telephone	Ousephkutty, Varna, Dewan Agency	Two days after Ousephkutty faxed his information, Dewan’s office in Dubai called him back. Varna told him he would need to pay 13,500 Dirhams (United Arab Emirates money) 3 times for Pol, Burnett, and Dewan. The paperwork would not begin until after he made the first payment. The second payment would be due when his certification came through. The third payment would be due when his green card came through.
F66	2004	Phone call	Veetil, Manish	Veetil called the Dewan office and spoke to Manish regarding the advertisement. He was then told that there would be a seminar with Michael Pol in Grand Hotel Abu Dhabi.
F67	2004	In person meeting at Dewan office	Panicker, brother of Sachin Dewan	Panicker attended a seminar at Dewan’s office. Dewan’s brother gave the presentation to about 300 people, who were told that they would be given a H2B visa, then an extension and a green card at that time. Panicker was told the accommodations and food would be free.
F68	2004	Newspaper Ad	Varghese Pappachan, Dewan Consulting Agency, J&M	Pappachan saw an ad in Malyalam Manorama advertising the “best opportunity within the US with a green card.”
F69	2004	Payments to Rao, Manish, and Sachin Dewan in Kochi	V . Babu, Manish, Sachin, Rao	V. Babu paid a total of 2 ½ lakh rupees in cash to Sachin in the presence of Rao and Manish; he was told the price had increased because of demand; V. Babu pledged his wife’s gold to borrow for this second installment.
F70	2004	In-person interview, Grand Hotel in Kochi	Pol, Burnett, Pappachan	Pursuant to the advertisement, Pappachan attended an interview/seminar. He was told it would cost 7 lakh rupees to participate in the program, to be paid in three installments. He was told that this would cover the cost of the visa.
F71	2004	First installment, Kochi	Dewan, Burnett, Pol, Pappachan	Pappachan was told that there would be a fee to pay by check, and was encouraged to pay in cash. His first payment was 55,000 rupees by check to Dewan, and the equivalent amount in dollars to Pol and Burnett. Paid total of \$14,000.
F72	2004	In person, Kochi	Pillai, Sachin Dewan, Malvern Burnett, Michael Pol, and an representative from J&M (President)	Pillai went to a hotel in Kochi on three separate occasions to meet with S. Dewan, Burnett, Pol, and a representative from J&M.

F73	2004	In person, Kochi	Pillai, Sachin Dewan, Malvern Burnett, Michael Pol	Pillai paid \$1,250 each to Michael Pol and Malvern Burnett on two separate occasions.
F74	2004	Private transaction	Pillai	Pillai borrowed 6 lakh rupees from private lenders at 60% interest annually and 5% per month over two years.
F75	2004	In person	MedTech, Manish, Ponnann, Sachin, Dewan Consulting	Ponnann went to the MedTech office in Dubai for an interview with Manish and Sachin. After 6 months, MedTech sent him to Dewan Consulting. Ponnann was told he had to pay 6 lakhs rupees in three installments. The three payments would be to Malvern Burnett, Michael Pol and Sachin. He was told they would work on his immigration papers, and that Ponnann would be brought to work for Indo-Amerisoft while they were working on his green card.
F76	2004	Newspaper Ad	Krishnan Venugopal	When he was in Mumbai, Venugopal saw an advertisement in a newspaper about Rao’s company (Indo-AmeriSoft) looking for people to hire.
F77	2004	In person	Venugopal, Sachin	Venugopal went to see Sachin. Sachin told him that they would arrange for a green card with work status. Sachin told him that Rao would be coming to India in two months and that they could speak in person then. The cost would be 600,000 rupees (6 lakhs).
F78	2004	Newspaper ad; Malayal Manorama	Sajimon Kutty	Kutty saw a newspaper ad in the <i>Malayala Manorama</i> concerning the recruiters, Dewan Consultants.
F79	2004	Kochi; in-person meeting and conference	Kutty; Sachin Dewan; Salimon; Michael Pol; other prospective workers	Kutty attended a conference/interview in Kochi during which the recruiters and other defendants discussed potential work opportunities with prospective workers.
F80	2004	Newspaper ad	Joseph Boban Peruvetilil	While Peruvetilil was on vacation from Oman he saw an ad in a Malayalam newspaper for pipefitters. He saw a number for Salimon in the ad.

F81	2004	Phone call, in person meeting in Kochi	Peruvelil, Salimon, Dewan, Burnett, Dewan's sister	Peruvelil called Salimon after seeing the ad. He went to Kochi where he was told that Sachin and the attorney would be there. Within three days of when Peruvelil spoke to Salimon there was a meeting. Peruvelil went and was told about the process and cost. Peruvelil was told about three companies' names at the meeting: J&M, Indo Ameri-soft, and Zito. He was told about Zito and J&M and recruited by them. At the meeting he was told about processing for green cards. Sachin told him about salary and installments regarding processing of the green card. Transportation and accommodation would be provided free. They said they would provide apartments with 2 per room. Peruvelil was told at the meeting that he would need to pay 3 installments totaling 5 lakh. Each installment needed to be divided to 3 shares. He was told one payment each would be made to Michael Pol, Malvern, and Sachin. Sachin and Salimon did all of the talking. He was told 25,000 rupees needed to be paid initially to begin the process. This needed to be paid one week after meeting in Kochi.
F82	2004	In person meeting	Peruvelil, Salimon	Peruvelil registered and met with Salimon and then went back to Oman. Salimon was by himself, and told Peruvelil that first they would apply for labor certification which is part of his first installment, and then there would be a 6-8 months gap while waiting for labor certification. Peruvelil pledged his wife's gold for the first installment. After waiting for labor certification he would have to pay second installment to get an I-140.
F83	2004	Mail, telephone, and in-person meetings	Kutty; Michael Pol; Sachin Dewan; other prospective workers	Kutty made two payments of 55,555 rupees each to Michael Pol and Sachin Dewan; he also had to pay 3,500 rupees for a medical test, the payment for which was in cash to Sachin. In order to get the money, Kutty pledged gold from friends to get a loan; borrowed from private agencies with high interest rates; and pledged his property for a housing loan.

F84	Jan-04	In person meeting at Trident Hotel in Kochi	Arackal, S. Dewan, Salimon, Kurella Rao (Indo-AmeriSoft) and 20-25 other prospective workers	Arackal was told by Dewan and Salimon that he would have an opportunity to do welding and ship building work for Indo-AmeriSoft in the United States. He was told it would cost 500,000 rupees and he would have to pay a deposit of 165,000 rupees to initiate the process. Dewan and Salimon told him that it would take six to eight months to get labor certifications and green cards.
F85	9-Jan-04	In-person meetings in Dubai	Raghavan, Rao, Dewan	Raghavan went to Dubai office of Dewan Consultants, met with Roa and Dewan for testing, paid 1,000 dirham for tests.
F86	January 13, 2004 and January 27, 2004	In person	MedTech, Ponnann	Ponnann went to Medtech and paid \$2000 and \$13,000, respectively.
F87	January 14-18, 2004	In person, UAE	B. Joseph, Burnett	Burnett told B. Joseph that within 18 months he could get a green card.
F88	17-Jan-04	In person meeting	Mali, Rao, Sachin Dewan, Burnett, Indo-Ameri Soft, Manish Dewan	Mali was promised that within a year of his arrival in the U.S., Indo-Ameri Soft would obtain a Green card for him. Mali was told that he would have to wait a couple of months and would call again when the delegation visited. Mali gave Indo-Ameri Soft \$2,750 in exchange for a promissory note for 1 Lakh 25,000 Rupees or \$2,750 at an interest rate of 7% to be paid if Indo-Ameri Soft failed to file for a Labor Certification Application and failed to obtain approval within nine months.
F89	19-Jan-04	First installment paid	Raghavan, Rao, Dewan	After receiving labor certificate, Raghavan paid first installment of \$2,750.
F90	24-Jan-04	In person meeting at Trident Hotel, Kochi	Arackal, Salimon, Malvern Burnett	Arackal has second meeting at Trident Hotel where he makes first payment of 165,000 rupees, 100,000 rupees to Burnett by check and 65,000 rupees to Salimon in cash.
F91	January 2004 (approx.)	Newspaper ad, Kochi, India	Sojan Paul Kaliyadan	Kaliyadan saw a Dewan Consulting ad in a Saudi Arabian newspaper, the <i>Malayala Manorama</i> , stating that there was work in construction in the United States.

F92	January 2004 (approx.)	By telephone, India	Kaliyadan and Salimon	Kaliyadan called the number listed in the ad and spoke with Salimon of Dewan Consulting who told him to work in the United States would lead to a green card, and invited him to a meeting at Dewan’s Kerala office.
F93	Feb-04	In person meeting	Kaliyadan, Salimon, S. Dewan, lawyer associated with Dewan Consultants.	Kaliyadan visited S. Dewan’s Kerala, India office and was told by Dewan that the work in the United States would lead to a green card and that the process would take approximately 24 months. Dewan told Kaliyadan that it would cost him 500,000 Indian rupees, to be paid in three installments.
F94	Feb-04	Newspaper advertisement, in person meeting, Dubai	Lakhhbir Singh, a friend of Singh, Kurella Rao, Sachin Dewan, Manish Dewan, Malvern Burnett, other prospective workers	Singh heard from a friend about a newspaper ad in Dubai proposing construction work in the United States, and Singh went with a friend to a meeting at Dewan Consultants’ offices in Dubai. Rao, and Manish Dewan told the attendees that the work in the United States would lead to a green card and that they would have to pay money in installments to qualify.
F95	Early 2004	Newspaper advertisement; Kerala, India	Sreedharan Babu	S. Babu saw an advertisement in a newspaper in Kerala, India, from Dewan Consultants, promoting work in the United States and promising further details at a meeting scheduled at the Meridian Hotel in Kochi.
F96	Early 2004	In-person meeting in India	John, Agent of Sachin Dewan	John attended an interview and skills test.
F97	Early 2004	In-person meeting in Kochi India	John, Sachin Dewan or representatives or Dewan Consultants	John signed a contract and made his first payment.
F98	Early 2004	In-person meeting Meridian Hotel, Kochi	S. Babu, Michael Pol, Sachin Dewan, Salimon, hundreds of other prospective workers	S. Babu attended a meeting where Pol spoke in English, S. Dewan spoke in Hindi and Salimon spoke in Malayalam. They told the prospective workers that they would get green cards, but would need to pay 6.5 Lakh Indian Rupees in three installments over a period of 18 months.
F99	Early 2004 to early 2005	Electronic mail, telephone or fax (wires) in India	John, agent of Sachin Dewan or Dewan Consultants	John asked about the labor certificate that he had not received.
F100	March 2004 (approx.)	In person meeting, hotel in Kochi	Kaliyadan, S. Dewan, Michael Pol and perhaps 200 prospective workers.	Dewan and Michael Pol of J&M told the workers that they would get green cards for their work in the United States, and explained the payment requirements.

F101	early to mid-March 2004	Electronic mail, telephone or fax (wires) between Dubai, UAE; Mumbai, India; or New Orleans, Louisiana to unknown newspaper in Dubai, UAE	Sachin Dewan and other representatives of Dewan Consultants	Transmission of advertisement indicating offer of opportunity for work-based permanent residence in the United States and announcing informational meetings in March 2004.
F102	early to mid-March 2004	Mails, or telephone, fax, or electronic mail (wires) between New Orleans, Louisiana; Mississippi; Mumbai, India; and/or Dubai, UAE	Malvern C. Burnett, Burnett Law Offices, GCILC, Michael Pol, Global Resources, J & M Associates, Sachin Dewan, and other representatives of Dewan Consultants	Discussions and transmission of materials related to March 2004 Dubai, United Arab Emirates (UAE) seminar. Specific information regarding these communications is currently in the sole possession of Defendants.
F103	late-March to mid-April 2004	Mails, or telephone, fax, or electronic mail (wires) between New Orleans, Louisiana; Mississippi; Mumbai, India; and/or Dubai, UAE	Malvern C. Burnett, Burnett Law Offices, GCILC, Michael Pol, Global Resources, J & M Associates, Sachin Dewan, and other representatives of Dewan Consultants	Discussions and transmission of materials related to April 15, 2004 (on or about) Dubai meeting. Specific information regarding these communications is currently in the sole possession of Defendants.
F104	Spring 2004	Newspaper ad	Pankajakshan Madhavan	Madhavan saw an ad in the Malayala Manorama placed by Dewan Consulting, describing a recruiting meeting at the Hilton Hotel in Kochi.
F105	Spring 2004	In person meeting, Trident Hilton Hotel, Kochi	Madhavan, Sachin Dewan, Salimon	Madhavan went to a recruiting meeting at the Trident Hilton Hotel in Kochi attended by a large group of people. At this meeting, Sachin Dewan and Salimon told the attendees that they were recruiting workers to work for J&M Associates overseas, that within 9 months they would be provided a green card, and that they could travel with their family. Sachin Dewan and Salimon further told them that they had a few weeks to think about it and there would then be another meeting that would be attended by Michael Pol and Malvern Burnett.
F106	Apr-04	Newspaper ad	Omanakutta Govindan Kakkanthara, Dewan Consultants	Kakkanthara saw an ad in the <i>Malayala Manorama</i> , stating that there was an opportunity to get a green card in the United States. The ad mentioned a meeting at the Hotel Trident in Kochi, as well as a phone number for Dewan Consultants.
F107	Apr-04	Telephone	Kakkanthara, Salimon	After viewing the newspaper ad, Kakkanthara called the number and reached Salimon, an agent of Dewan Consultants. He said that the meeting would happen in Kochi and to be there on a certain date.

F108	Apr-04	In person meeting, Grand Hotel Abu Dhabi	Veetil, Manish, Pol, Sachin Dewan, Burnett	Veetil went to a seminar, with 75 other people, and was told that it would cost \$41,000 dirhams or 6 lakh rupees for the whole process of obtaining a job with J&M and obtaining a green card.
F109	Apr-04	In-person meeting, Kochi, India	Kakkanthara, Malvern Burnett, Michael Pol, Sachin Dewan, Salimon	Kakkanthara attended the meeting at the Hotel Trident in Kochi, where he was told that he could go to the United States with a green card, that it would take 18 to 24 months, that he would have to pay a total of 6 lakh rupees, and that he could bring his family.
F110	Apr-04	In-person meeting, Kochi, India	Kakkanthara, Salimon	Kakkanthara agreed to sign the form saying that he would work for J&M Associates and was told to take a skills test, which cost 1,500 rupees. 1,000 rupees went to Salimon.
F111	6-Apr-04	Letter, contract, Mumbai, India and Kerala and Trissur, Kerala, India	Kaliyadan, Michael Pol, Dewan Consultants, J&M Associates, Global Resources	Kaliyadan signed a contract for employment with J&M Associates and was advised in writing by Dewan Consultants on behalf of Global Resources that he had been selected to work for J&M Associates in California and the letter confirmed requirements for payments by Kaliyadan.
F112	mid- to late-April, 2004	Banking transactions in United States, India, and/or Dubai, UAE	Sachin Dewan, Michael Pol	Deposit of funds collected in first installment payments.
F113	late April 2004	Mails, or telephone, fax, and/ or electronic mail (wires) between New Orleans, Louisiana; Mumbai (Mumbai), India; and/or Kochi, India	Malvern C. Burnett, Law Offices of Malvern C. Burnett, GCILC, Kurella Rao, Indo-Amerisoft LLC, Sachin Dewan, and Dewan Consultants	Discussions and transmission of materials, including the IAS/Kurella Rao promissory note, related to preparing for the Kochi meeting and preparation of contracts and other paperwork to be signed at the late April 2004 meeting. Specific information regarding these communications is currently in the sole possession of Defendants.
F114	25-Apr-04	Payment	Kakkanthara, Michael Pol, Malvern Burnett, Sachin Dewan	Kakkanthara was then given 15 days to pay the first installment, 55,555 rupees each for three people. Kakkanthara paid on approximately April 25, 2004: Bank draft to Michael Pol, Bank draft to Malvern Burnett, Cash to Sachin Dewan
F115	April or May 2004	In-person meeting	Pottirayil, Michael Pol, and another gentleman	Pottirayil met with Michael Pol and another gentleman, who wanted a biometric form and the first payment. Told him that after the payment he would receive a labor certificate in six months.

F116	April or May 2004	Payment	Pottirayil, Sachin Dewan, Michael Pol, the gentleman with Michael Pol	Pottirayil paid 65,000 rupees to Sachin Dewan, 65,000 rupee equivalent to Michael Pol, and 65,000 rupee equivalent to the gentleman with Michael Pol
F117	April or May 2004 to April or May 2005	Telephone	Pottirayil, Salimon, Sachin Dewan	Pottirayil regularly contacted Salimon and Sachin Dewan, and he was informed that this request was being processed.
F118	May-04	In person meeting, Grand Hotel Abu Dhabi	Veetil, Manish, Pol, Sachin Dewan, Burnett	Veetil went to another group meeting where a paper test was taken and Pol prepared paperwork, and then Veetil paid the first installment of 3 drafts, \$1222 U.S. dollars to Dewan, Pol and Burnett. Dewan and Burnett promised Veetil a green card within 18 months.
F119	May-04	Newspaper	Jagannadha Rao Saragadam	Saragadam read about the opportunity to work in the United States and receive a green card in the Eenadu newspaper. The ad stated that interested workers should come to a meeting in a hotel.
F120	May-04	In person meeting, Trident Hilton Hotel, Kochi	Madhavan, Sachin Dewan, Salimon Dewan, Pol, Burnett	Madhavan returned to the Trident Hilton Hotel in Kochi for a second meeting. Pol and Burnett were present along with Salimon and Sachin Dewan. After waiting several hours in a long line, Madhavan met with Pol and Burnett. He told them about his background in welding; they told Madhavan if he provided his passport they would file his immigration paperwork. Pol and Burnett informed Madhavan that he would have to make a series of payments of 59,000 rupees each to Pol, Burnett, and Dewan. Madhavan gave Pol and Burnett his passport.

F121	May-04	In-person meeting in Visakhapatnam	Saragadam; Sachin Dewan; approximately 60 other prospective workers; Michael Pol; Malvern Burnett	Saragadam attended a conference in a hotel in Visakhapatnam. Sachin Dewan explained that there were jobs available for J&M International, and that the workers would receive an H2B visa which would be extended twice. J&M would then apply for a green card for the workers. Sachin explained that the entire cost would be six lakhs, paid in three installments. Each installment consisted of three payments of \$1250. The first two were checks to Malvern Burnett and Michael Pol respectively, and the third was to be paid in rupees to Sachin.
F122	24-May-04	Payment to Global Resources	Attayil, Global Resources	Attayil paid \$1,240 to Global Resources.
F123	27-May-04	Payment to Malvern Burnett	Panicker, Malvern Burnett	Panicker paid \$1217 via check to Burnett, received a receipt stating the payment was “Advance fees for the process of Permanent Residence Visa.”
F124	27-May-04	Payment to Global Resources	Panicker, Michael Pol	Panicker paid \$1217 via check to Global Resources
F125	28-May-04	Payment to Malvern Burnett	Attayil, Burnett	Attayil paid \$1,240 to Burnett.
F126	Late May 2004	In-person meeting in Visakhapatnam	Saragadam; Sachin Dewan; Michael Pol; Malvern Burnett	Saragadam returned to the same hotel with the payments required at the earlier meeting. He received receipts for the payments to Pol and Burnett, but did not get a receipt from Sachin Dewan.
F127	May 2004 – January 2006	Telephone calls	Saragadam; Sachin Dewan	Saragadam called Sachin Dewan regularly to inquire about his applications, but was always told that the payment was merely being processed.
F128	June 2004 (approx.)	In person meeting in Dubai	M. Dewan, Singh	Singh met with S. Dewan at the Dewan Consulting offices in Dubai and paid the first installment. Singh was promised that he would get work at \$18.00 per hour and would get a green card. He was not told until he got to the United States that a charge for his room and board would be deducted from his wages.

F129	June 2004 (approx.)	In person meeting, hotel in Kochi	Kaliyadan, S. Dewan, Malvern Burnett and approximately 100 other prospective workers	Burnett, an American lawyer, confirmed to the prospective workers that they would get green cards in the U.S. as a result of the process, but would have to pay. At this time Kaliyadan made his first payment of approximately 165,000 Indian rupees, a portion to Dewan in cash, a portion to Burnett by banker’s check in dollars, and a portion to Global Resources, also by banker’s check in dollars.
F130	Jun-04	Newspaper ad, Dubai	Kiran Mohan Baki	Baki saw an advertisement in the <i>Gulf News</i> when he was working in Dubai. The ad was by Dewan Consultants and solicited interest in workers to do welding work in the United States.
F131	2-Jun-04	In person, Dubai	Tamang, S. Dewan, Rao	Tamang was told that he would have to pay three installments. Tamang gave Indo-Ameri Soft \$2,750 in exchange for a promissory note for 1 Lakh 25,000 Rupees or \$2,750 at an interest rate of 7% to be paid if Indo-Ameri Soft failed to file for a Labor Certification Application and failed to obtain approval within nine months. Tamang borrowed funds from a bank to finance the payments.
F132	Mid-2004	Payment	S. Babu, Pol, Malvern Burnett, S. Dewan	S. Babu paid his first installment approximately two months after the meeting at the Meridian Hotel. He divided it between S. Dewan, Pol and Burnett and paid all three in cash. He received receipts from Pol and Burnett, but not from Dewan.
F133	Mid-2004	Payment, Mumbai, India	Murugaiyan, Rao, Indo-Amerisoft	Murugaiyan made his second payment of 165,000 Rupees in cash to Rao and Indo-Amerisoft.
F134	Summer 2004	Payments to Pol, Burnett, and Dewan	Madhavan, Dewan, Pol, Burnett	Madhavan paid 59,000 rupees each to Pol, Burnett, and Dewan, all in cash.
F135	August or September 2004	Mails, or telephone, fax, and/ or electronic mail (wires) between New Orleans, Louisiana; Mumbai, India; and/or Dubai, UAE	Sachin Dewan, Dewan Consultants, Kurella Rao, IndoAmerisoft LLC, Malvern Burnett, Burnett Law Offices, and GCILC	Discussions and transmission of materials related to preparing for Dubai meeting to update workers on progress of green card applications. Specific information regarding these communications is currently in the sole possession of Defendants.
F136	Sep-04	Telephone	Mali, Rao, Dewan, Burnett	Rao, S. Dewan and/or Burnett telephoned Mali several times.

F137	20-Sep-04	Payment	Koottalil, Dewan, Rao	Koottalil made a payment of 4880 Dirham to Dewan and payment of \$2,750 to Rao.
F138	24-Sep-04	Payment	Tamang, S. Dewan, Indo-Ameri Soft	Tamang paid \$2,750 to Indo-Ameri Soft and 4830 Dirhams to Dewan Consultants for advance fees for processing of a permanent resident visa.
F139	September or October 2004	Mails, or telephone, fax, and/ or electronic mail (wires) between New Orleans, Louisiana; Mumbai, India; and/or Dubai, UAE	Sachin Dewan, Dewan Consultants, Kurella Rao, IndoAmerisoft LLC, Malvern Burnett, Burnett Law Offices, GCILC	Discussions and transmission of materials related to the progress of green card applications and representations to be made to workers regarding the process, including planning for a November meeting in Dubai and preparation of a letter to the workers from Malvern Burnett. Specific information regarding these communications is currently in the sole possession of Defendants.
F140	Between September or October 2004 up to early- to mid-January 2006	Mails, or telephone calls, fax, or electronic mail (wires) between New Orleans, Louisiana; Mississippi; Mumbai, India; and/or Dubai, UAE	Malvern C. Burnett, Burnett Law Firm, GCILC, Michael Pol, Global Resources, J & M Associates, Sachin Dewan, and other representatives of Dewan Consultants	Discussions related to pending J & M Associates applications for labor certification and representations to be made to applicants regarding the green card process. Specific information regarding these communications is currently in the sole possession of Defendants.
F141	Oct-04	Newspaper ad	Suresh Kumar Pillai Kavalamkuzhi	Kavalamkuzhi read an ad in a newspaper from the UAE. The ad was from Dewan Consultants and promised opportunities for welders and pipefitters to go to the United States. It promised permanent residency.
F142	Oct-04	Email	Kavalamkuzhi, Sachin Dewan	Kavalamkuzhi emailed Dewan Consultants about the opportunity, and was told by Sachin Dewan that he needed to go to India or the UAE (he was currently in Azerbaijan) to pursue the opportunity. When Kavalamkuzhi asked for emergency leave from his job, they denied him. Thinking that Dewan Consultants was legitimate, Kavalamkuzhi resigned from his job and gave up his bonus.
F143	Nov-04	Payments to Pol, Burnett, and Dewan	Madhavan, Dewan, Pol, Burnett	Madhavan paid 59,000 rupees each to Pol, Burnett, and Dewan, all in cash.

F144	Nov-04	In person meeting, Kochi	Kavalamkuzhi, Dewan, Burnett, Salimon	Kavalamkuzhi went to Kochi for a seminar at the Trident Hotel. Sachin Dewan, Salimon, Malvern Burnett, and at least 30 prospective workers were in attendance. At the seminar, Kavalamkuzhi was told that they would eventually be able to bring their families over from India, and that they would be working for a company called J&M. Sachin told the workers that the Visa process would take up to two years. The workers were asked to pay three installments of 66,000 rupees each (approximately \$1400 each). Kavalamkuzhi paid 25,000 rupees (\$500) to Salimon at the hotel in Kochi; 30,000 rupees (\$600) in cash to Dewan; 60,000 rupees in drafts to both Malvern Burnett and Michael Pol.
F145	22-Nov-04	Letter, Mumbai, India to Kerala, India	Kaliyadan, Michael Pol	Pol wrote Kaliyadan (and others referred to as “Green Card Candidates”) to let them know that Malvern Burnett had initiated alien labor certification on behalf of their supposed permanent employer, J&M Associates. Pol stated: “Congratulations, you are now in a position to be one in the first in line to take advantage of the ‘PERM’ program,” supposedly leading to a green card in the United States.
F146	November 2004 – December 2005	Telephone Call	Madhavan, Dewan	In November 2004, Madhavan was told that his paperwork had been submitted and he needed to wait. Madhavan made frequent calls to Dewan during 2005 and was told to continue to wait.
F147	Late 2004	Payments to Manish, and Sachin Dewan in Kochi	V. Babu, Manish, Sachin	V. Babu paid a total of 3 lakh rupees in cash to Sachin and Manish. He borrowed this money by pledging his house at 10% interest.

F148	Dec-04	Newspaper ad	Eswara Kannithi	Kanithi saw an ad for Dewan Consultants in a newspaper, advertising jobs for welders, structural fitters, fabricators and marine engine fitters, offering a green card and “permanent lifetime settlement in U.S.A. for self and family,” with a “job guarantee provided for 2 to 3 years” and earnings of “4000 to 5000 US\$ per month.”
F149	Dec-04	Newspaper ad	Varghese Devassy, Dewan Consultants	Devassy saw an ad stating that there was an opportunity to get a green card in the United States. The ad a phone number for Dewan Consultants.
F150	Dec-04	Telephone	Devassy, Sachin Dewan	After viewing the ad, Devassy called the number and reached Sachin Dewan, of Dewan Consultants. He was told to attend a seminar at the Trident Hotel in Kochi.
F151	Dec-04	In person meeting at Dewan Consulting office, Dubai	Kannithi, Sachin Dewan, Pol, Burnett	Sachin told Kannithi that he would get more money in the United States and this was a good opportunity. Burnett and Pol told him he would get a green card and could take his family along.
F152	Dec-04	In-person meeting, Trident Hotel, Kochi, India	Devassy, Michael Pol, Malvern Burnett, Sachin Dewan, and Salimon.	Devassy attended a seminar at the Trident Hotel in Kochi. Michael Pol and Malvern Burnett were there as representatives of J&M Associates. Sachin Dewan and Salimon were also there. Devassy was informed that to get to the United States on a permanent visa/green card, with your family, there were three steps: (1) labor certification, (2) I-140, (3) 485. There would be fees at each step, and a total of 6 lakh rupees would have to be paid.
F153	Dec-04	Newspaper ads in Kochi; mail	Phillip Baby; Sachin Dewan	Baby saw an advertisement in the <i>Malayala Manorama</i> while working in Kochi. The ad discussed work for 2-3 years and facilitation of a permanent visa/green card. He responded to the ad by mail and got an invitation from Sachin Dewan.
F154	Dec-04	Telephone	Devassy, Salimon	After the seminar, Salimon called Devassy and told him that they needed him to sign some paperwork and pay his first installment.

F155	Dec-04	Payment	Devassy, Pol, Burnett, S. Dewan	Devassy paid the first installment: 1 lakh 55,000 rupees. The payment went to: 50,000 rupees to Michael Pol via bank draft; 50,000 rupees to Malvern Burnett via bank draft; 55,000 rupees to Sachin Dewan in cash
F156	2004-2006	In person	Venugopal, S. Dewan, Rao	Venugopal paid a total of 600,000 rupees (6 lakhs) to Sachin and Rao. He borrowed some of the money from his father in law and uncle.
F157	2004-2006	Phone calls, letters	Kakkoth, Dewan Consulting	Between 2004 and 2006, Kakkoth remained working in Dubai, but he had weekly contact with Dewan Consulting about the status of his visa, etc. Kakkoth didn't get a clear answer until Aug. 2006 when he was told to go to Chennai immediately to get his H2B Visa. He was also told then that when he got to the U.S., he would be working for Signal.
F158	2005	Electronic mail, telephone or fax (wires), or regular mail	John, Sachin Dewan or Dewan Consultants	John received a labor certificate and paid the second installment.
F159	2005	Test, Chennai	Pappachan, Pol, Burnett	Pappachan took a pipe-fitting test in Chennai. Pol and Burnett were there.
F160	2004-2007	In person	Ousephkutty, Varna, Dewan, Pol, Burnett	Ousephkutty paid Dewan, Pol, and Burnett with checks. He made the first payment in 2004 and was told that he would be working for J&M. Nothing happened for 2 years. He was told he would be given an H2B Visa to go to the United States, and then they would give him a job and a green card. He was told he would need to pay the third installment before he would receive his green card. He made all of the payments, but never received a green card. In order to make the payments, Ousephkutty sold his wife's jewelry and financed his home.

F161	2005-2006	Mail; telephone; in-person meeting; bank transactions	Baby; Sachin Dewan; Malvern Burnett; J&M	Baby made several payments to defendants and in connection with coming to the United states. First, he made three payments (two by check and one in cash) to Sachin Dewan for a total of six lakh. Second, he made an additional payment of 1250 rupees to Sachin Dewan. Third, he made a separate payment of 35,000 rupees to Sachin Dewan, including his plane ticket. Fourth, he paid between 7,000 and 8,000 rupees for medical check-ups for J&M and then Signal. Finally, he paid 4,800 rupees to the American consulate.
F162	Feb-05	Telephone, Dubai	Baki, Dewan Consultants	Baki called Dewan Consultants to inquire about the ad. Someone from Dewan told him to set up a meeting on the weekend and explained that he would have to pay a total of 6 lakhs or 600,000 rupees in three installments in order to pay for the process of coming to the United States and obtaining a green card. He was told to bring 2000 dirhams (UAE currency) with him to the first meeting to initiate the process, and that all installments and deposits were to be paid to Dewan in cash.
F163	2-Feb-05	Payment to Dewan Consultants	Kannithi, Dewan Consultants	Kannithi paid 3,000 dirhams to Dewan as an advance for resident visa processing.
F164	Late February 2005	In person meeting in Dubai	Sachin Dewan, Manish, Dewan, Baki and approximately 70 other prospective workers	S. Dewan did most of the talking at this meeting, confirming that there were jobs available in the United States and that Dewan Consultants would send Baki to work for a company called Global Resources, Inc., USA. He had Baki sign a “Dewan Consultants Services Agreement” contract, told the prospective workers how to fill out the English documents they were given by Dewan Consultants, and collected a deposit from Baki of 2000 dirhams (approximately \$544.60 USD).

F165	Mar-05	In person meeting, Dewan Consultants office, Dubai	Baki, S. Dewan, other Dewan Consultants' personnel, other prospective workers.	Baki attended a second meeting at the Dewan Consultants' office in Dubai where he paid an installment of 11,500 dirhams. At this second meeting, Dewan told Baki that Global Resources no longer existed and that he would instead be working for J&M Associates, and that the process of obtaining a green card would take 6-18 months. Baki signed a contract with J&M at Dewan's direction.
F166	4-Mar-05	Payment to Global Resources Inc.	Kannithi, Global Resources Inc.	Kannithi paid \$1,222 to Global Resources Inc. via check.
F167	Early 2005	Telephone	Kakkanthara, Salimon	After several months of hearing nothing from Salimon or Sachin Dewan, Kakkanthara began calling Salimon to check on the status. He was told that Salimon was busy and that he was interrupting.
F168	Early 2005	Telephone	Devassy, Salimon	Three months after he paid the first installment, Devassy received a call from Salimon that his labor certification had been approved. He was told that it was time to pay the second installment.
F169	Early 2005	In-person meeting	Devassy, Salimon, Sachin Dewan, Malvern Burnett, Michael Pol	Devassy went to see Salimon, Sachin Dewan, Michael Pol, and Malvern Burnett. They gave him a copy of his labor certificate and had him sign an employment contract.
F170	Early 2005	Payment	Devassy, Sachin Dewan, Michael Pol, Malvern Burnett	Devassy paid the second installment: 1 lakh 55,000 rupees. The payment went to: 50,000 rupees to Michael Pol via bank draft; 50,000 rupees to Malvern Burnett via bank draft; 55,000 rupees to Sachin Dewan in cash
F171	Early 2005	Payment, Kochi, India	S. Babu, S. Dewan, Burnett	S. Babu paid his second installments in early 2005 to S. Dewan and Burnett.
F172	Apr-05	In person meeting at Trident Hotel, Kochi	Rao, Arackal	Arackal paid second installment of 165,000 rupees, 100,000 to Rao by check and 65,000 rupees in cash to Dewan Consultants. Arackal was told it would take about six more months before he could get his green card and go to work for Indo-AmeriSoft in the U.S.

F173	Apr-05	In-person meeting in Kochi	Baby; Malvern Burnett; Michael Pol; Sachin Dewan	Baby attended an interview with the defendants in the Hotel Trident Hilton in Kochi, during which they discussed the requirement of three payments of six lakh and promised permanent resident status or a green card.
F174	Apr-05	In-person meeting in Kochi	Baby; Sachin Dewan; Signal representatives	Baby underwent a skills test during which he was promised \$14 per hour as welder/pipefitter.
F175	April or May 2005	Correspondence via regular mail	Pottirayil, Sachin Dewan, Salimon	Pottirayil received correspondence saying that the Senate had passed new immigration laws, that Hurricane Katrina had taken place, and that they had lost all of their papers in the hurricane.
F176	May-05	Newspaper ads, UAE	Iju James	James saw ads in the <i>Gulf News</i> and the <i>Khaleej Times</i> promoting employment for welders and fitters in the United States, which would lead to green cards, listing times for meetings in Abu Dhabi and Dubai. Ad was by Dewan Consultants.
F177	May-05	Bank transactions, Dubai	Baki, Bank	Baki took out a bank loan for 400,000 rupees in order to pay the second installment Dewan was requiring for the green card, which he paid around August 2005.
F178	Mid-2005	In-person meeting at the Hilton Hotel, Kochi	Varkey, Sachin Dewan, Salimon, Burnett and Pol, other prospective workers	Varkey attended a meeting at the Hilton Hotel in Kochi where Sachin told the attendees that Hurricane Katrina had caused a delay in the paperwork, but that within a year the workers would receive their work permits and leave for the United States, and that within eight months of their arrival in the U.S. , they would receive green cards for themselves and green card status for their families. Attendees were told that they would be working for Signal, rather than J&M. Varkey told Salimon and Sachin the he was concerned about giving them more money, because nothing had happened yet. They told Varkey not worry, but if things did not work out, he would get his money back.
F179	Mid to late 2005	Correspondence via regular mail	Pottirayil	Pottirayil received his labor certification

F180	Mid to late 2005	In-person meeting in Kochi, India	Pottirayil, Sachin Dewan, Salimon, Michael Pol	Pottirayil went to another meeting in Kochi with the defendants, during which they asked for more money for processing.
F181	Mid to late 2005	Payment	Pottirayil, Sachin Dewan, Michael Pol, the gentleman with Michael Pol	Pottirayil paid 65,000 rupees to Sachin Dewan, 65,000 rupee equivalent to Michael Pol, and 65,000 rupee equivalent to the gentleman with Michael Pol
F182	15-Jun-05	Payment to Malvern Burnett	Kannithi, Burnett	Kannithi paid \$2,260 to Burnett via two checks of \$1,130 each.
F183	30-Jun-05	In person meeting – Media City (Dubai)	James, Dewan Consultants (including Varuna Dewan, Sachin Dewan and Manish Dewan)	The Dewans told James that if he accepted the U.S. employment offer, he would receive a green card and his family would be able to receive green cards as well. At first he was told the name of the company he would be working for was Global Resources, but later he was told it would be J&M. Varuna Dewan told James that the entire cost would be approximately 6 Lakhs to be paid in three installments.
F184	Approximately July 2005	In person meeting, hotel in Dubai	S. Dewan, Michael Pol, Malvern Burnett, Baki and approximately 15 other prospective workers.	At this meeting Dewan explained to the prospective workers that Pol and Burnett were lawyers from the United States who would take care of the paperwork related to obtaining the green cards Dewan was promising the workers. Dewan told the workers that they would get a green card within one year and told Baki that he would be able to bring over his entire family, at a cost of an additional \$1,500 USD to bring each family member over. Baki said he did not have the money to apply for his entire family at that time, and Manish Dewan said that was fine because Baki could bring his family over later once he earned money in the United States. Baki ended up paying \$1,500 USD additional as a processing fee to Dewan for his wife to come over at a later date.

F185	Aug-05	In person meeting at Dewan Consultants office, Dubai	S. Dewan, Aruna Dewan, Baki and other prospective workers	Baki attended a third meeting with Dewan Consultants in Dubai in or around August 2005. During this meeting he paid the second installment of 13,500 dirhams. Baki was told by Aruna that he would initially travel on a Visa and that when he got to the U.S., he would get a green card. S. Dewan told Baki and the other workers to take a leave of absence from their jobs in Dubai and return to India and that someone from Dewan would contact them regarding a consulate interview to receive a Visa. Baki thereafter went back to India to wait for Dewan to contact him.
F186	Summer 2005	Electronic mail (wires) between Dewan Associates d/b/a Medtech Consulting in Dubai, UAE; Mumbai, India; or New Orleans, Louisiana; to Khaleej Times in UAE	Representatives of Dewan Associates	Transmission of advertisement indicating permanent residence visa for work in the United States
F187	Fall 2005	Wires	Malvern C. Burnett, Nicole Homel-Tellier, Billy Wilks	Exchanged drafts of J&M's labor certification applications
F188	Late 2005	Telephone	Pottirayil, Sachin Dewan, Salimon	Pottirayil repeatedly contacted Sachin Dewan and Salimon, but received no information.
F189	Late 2005	In-person meeting Chennai	S. Babu, S. Dewan, Pol, Signal employees	S. Babu was given a skills test in Chennai which included a written exam and a practicum test. S. Dewan and Pol were there as well as individuals from Signal.
F190	December 2005 through February 2006	Mails, or telephone, fax, or electronic mail (wires) between New Orleans, Louisiana, and Mumbai, India	Sachin Dewan, other representatives of Dewan Consultants, Kurella Rao, Indo-Amerisoft LLC, Malvern Burnett, Burnett Law Offices, GCILC, Global Resources, Signal	Discussions and transmission of materials related to progress of green card applications and representations to be made to workers regarding the process, including planning for a February 2006 meeting in Dubai and preparation of letters to green card applicants, listing payments and paperwork to be submitted by green card applicants. Specific information regarding these communications is currently in the sole possession of Defendants.

Joseph et al. v. Signal et al. , Civil Action No.: 1:13-cv-0343 First Amended RICO Fraud Chart

F191	2006	Newspaper, In person	Francis Joseph, Dewan, Burnett	While he was working in Dubai, F. Joseph saw an ad in the Malyalam newspaper. The ad described a job that would provide him and his family with green cards. The ad said to come to a seminar at a Dubai hotel where they told him there would be a fee of 2,000 Dirhams to start the paperwork, which he paid. At that time, he was told he would be going to work for J&M. He was then told he had to make 3 payments of \$1250 each for J&M, for Dewan and for Burnett. Dewan Consulting initially promised Joseph a job with J&M, a green card, and green cards for his family (his wife at the time).
F192	2006	In person, Dubai	Ponnan, Sachin, Signal	Ponnan was given a paper test in Dubai. Sachin Dewan and a representative from Signal were present while Ponnan took the test. During the test, Sachin told Ponnan that Signal would hire him and was already in the process of getting a green card for Ponnan.
F193	2006	In-person interview, Ernakulam, Kerala	Kunjachan Varghese, Dewan	K. Varghese was interviewed by Dewan and promised a green card.
F194	2006	Phone conversation, Chennai	K. Varghese, Salimon	Salimon called K. Varghese in Dubai and told him they needed him to go for an interview at the Consulate in Chennai.
F195	2006	Consulate Interview	Pappachan, Pol, Burnett	Pol and Burnett also attended Pappachan's consulate interview.
F196	2006	In-person meetings; Kerala and Chennai	Kutty; Sachin Dewan; Salimon; Signal employees	Kutty was made to take two welding skills tests, one in Kerala and one in Chennai; at both tests the recruiters and Signal employees were present.
F197	2006	In-person meeting in Dubai	Kutty; Malvern Burnett	Burnett was present in Dubai before Kutty signed the labor certification letter; at the time, Burnett promised that the green card processing was still active and being worked on.
F198	2006	In-person meeting	Kutty; Sachin Dewan	Kutty was prepared by Sachin Dewan for his meeting at the consulate; he was told not to tell the U.S. consulate that he paid money to anyone regarding his trip to the United States.
F199	2006	Electronic mail, telephone or fax (wires), or in-person meeting	John, Sachin Dewan or Dewan Consultants	John discussed a new opportunity with Sachin Dewan regarding Signal International. He agreed to the new opportunity and was required to pay an additional 150,000 rupees.

F200	2006	In-person meeting; telephone; bank transaction	Kainikkeril; Sachin Dewan	Sachin Dewan asked Kainikkeril for eight lakh, but because he had already paid three for Indo-Amerisoft, Kainikkeril was told that he would only have to pay five lakh.
F201	2006	In-person meeting	Kainikkeril; Salimon; Malvern Burnett	Kainikkeril was told to meet Salimon. He was asked to make out two checks, one to Malvern Burnett and other to someone else. Salimon then informed him that he would need to pay one lakh in order to cover the balance.
F202	2006	In-person meeting in Chennai	Kainikkeril; Salimon	Salimon contacted Kainikkeril to tell him that his interview with the U.S. consulate had been scheduled, and that they needed to meet in a hotel first. Salimon instructed Kainikkeril and approximately 15 other workers that they were to tell the consulate that they had not paid any money for this opportunity and that they would return to India when their visas expired.
F203	Early 2006	In person meeting at Trident Hotel in Kochi	Arackal, Salimon	Arackal’s fourth meeting at Trident Hotel. Salimon told him that jobs with Indo-AmeriSoft were uncertain, but that Signal had jobs, which would take about nine months to process and would offer a temporary H-2B Visa, and eventually a green card. Arackal wanted to back out of the deal, but Salimon told him he would not get any of his money back.
F204	Jan-06	Mail	Kakkanthara, Sachin Dewan, Dewan Consultants	Kakkanthara received a letter in January 2006 explaining that his labor certification had been approved, that Hurricane Katrina had caused many problems in the United States, and that Kakkanthara needed to pay the second installment.
F205	Jan-06	Letter, phone call	Kavalamkuzhi, Dewan employees	Kavalamkuzhi’s family received a letter that his labor certificate was complete. However, when Kavalamkuzhi looked at the list his name was not there. Dewan’s staff told him that they could just substitute him for someone who had not yet paid all their installments.
F206	Jan-06	Telephone	Kakkanthara, Salimon	Kakkanthara received a phone call from Salimon explaining that he needed to go to the Trident Hotel in Kochi to pick up his labor certificate.

F207	early to mid-January 2006	Mails, or telephone, fax, or electronic mail (wires) between New Orleans, Louisiana; Mississippi; Mumbai, India; and/or Dubai, UAE	Malvern C. Burnett, Burnett Law Offices, GCILC, Michael Pol, Global Resources, J&M Associates, Sachin Dewan, and Dewan Consultants	Discussions related to receipt of January 6, 2006 labor certification approval notice from USDOL, preparation and transmission of letter from Sachin Dewan to green card applicants dated January 24, 2006, and representations to be made to applicants regarding the labor certification approval and green card process. Specific information regarding these communications is currently in the sole possession of Defendants.
F208	Between January 2006 and October 2006	Mails, or telephone, fax, or electronic mail (wires) between New Orleans, Louisiana; Mississippi; Mumbai, India; and/or Dubai, UAE	Malvern C. Burnett, Burnett Law Offices, GCILC, Michael Pol, Global Resources, J & M Associates, Sachin Dewan, Dewan Consultants	Discussions and transmission of materials related to workers' green card applications sponsored by J & M Associates. Specific information regarding these communications is currently in the sole possession of Defendants.
F209	Jan-06	Telephone call	Saragadam; Sachin Dewan	Saragadam called Sachin Dewan and was informed that his labor certification was complete and that Saragadam would need to send his second installment.
F210	21-Jan-06	Letter, Mumbai to Kerala, India	Kaliyadan, Dewan Consultants.	Dewan Consultants advised Kaliyadan that his labor certification had been approved by the Department of Labor and enclosed an apparent approval dated December 12, 2005, addressed to J&M Associates. The letter explained that the "PERM" implementation had been delayed because of the election and Hurricane Katrina, but said that J&M was now moving ahead with the process of Kaliyadan's visa petition. The letter gave instructions for the payment of the second installment to Pol (instead of Global Resources), Burnett and cash to Dewan Consultants. Kaliyadan was instructed to appear with those payments at an in person meeting February 15, 2006.

F211	21-Jan-06	Letter from Dewan Consultants	Panicker, Sachin Dewan	Panicker received a letter from Dewan stating his labor certification was approved, demanding payments of \$1250 each to Michael Pol and Michael Burnett, with instructions that family visa are available for \$1500 per family member. Panicker was instructed to meet Pol, Burnett, and Dewan at the Hotel Trident Hilton in Kochi on February 15, 2006 along with his original contracts, receipts, and further payment.
F212	28-Jan-06	Bank transaction	Mali, Indo-Ameri Soft	Mali paid \$2,650 to Indo-Ameri Soft.
F213	28-Jan-06	Bank transaction	Tamang, Indo-Ameri Soft	Tamang paid \$2,650 to Indo-Ameri Soft.
F214	Feb-06 (approx.)	In person meeting, Dubai	M. Dewan, Singh	Singh met with M. Dewan in Dewan Consultants’ offices in Dubai to make the second installment on his payments. Singh paid a total of 29,500 dirhams and 260,000 rupees, plus an additional \$2,200 paid to Rao after Singh arrived in the U.S. to complete the process.
F215	February, 2006	In-person meeting, Kochi, India	Sachin Dewan, Salimon, Varkey, coordinator from Signal	Varkey took a welding test in Kochi, under the administration of a Signal employee, and Varkey passed the test.
F216	February, 2006	In person meeting – Media City, Dubai	James, Varuna Dewan	James took out a bank loan in order to make the first installment, 4500 Dirham each to Burnett and to Pol in checks and to Dewan in cash. Varuna gave him receipts and told him he would have to pay a second installment very soon.
F217	Feb-06	Payment	Peruvelil, Pol, Burnett, Dewan	Peruvelil paid the second installment via two checks and 1 cash payment. The payments were divided into three installments Pol, Burnett, and Dewan (paid in cash).
F218	Feb-06	Payment	Kavalamkuzhi, Dewan, Burnett, Pol	Kavalamkuzhi paid 60,000 rupees in cash to Dewan and in drafts to both Burnett and Pol.
F219	Feb-06	Payment to Kurella Rao	Mathew, Kurella Rao	Mathew paid 15,000 Dirhams to Rao, who told him he would give the money to Malvern Burnett.
F220	Feb-06	Payment	Kakkanthara, Sachin Dewan, Michael Pol, Malvern Burnett	The second installment was for the same amount as the first, 55,555 rupees each: Bank draft to Michael Pol; Bank draft to Malvern Burnett; Cash to Sachin Dewan

F221	Feb-06	In person	Ponnan, Sachin	Ponnan paid \$2650 U.S. to IndoAmerisoft, \$3000 U.S. to Malvern Burnett and \$4,700 U.S. to Sachin. In order to make these payments, he borrowed money from friends and worked in Dubai. .
F222	Feb-06	Telephone call	Saragadam; Sachin Dewan	Sachin Dewan called to inquire why Saragadam had not paid his portion of the second installment; Saragadam asked for an extension, which Dewan granted, though he stated that it would cost more money.
F223	2-Feb-06	Payment	Tamang, Dewan	Tamang paid 4,200 Dirhams to Dewan Consultants for advance fees for processing an I-140 Visa.
F224	2-Feb-06	Payment	Koottalil, Indo-Ameri Soft	Koottalil made a payment of \$2,650 to Indo-Ameri Soft.
F225	3-Feb-06	Payment	Koottalil, Burnett	Koottalil made a payment to Malvern Burnett.
F226	6-Feb-06	Payment	Koottalil, Dewan	Koottalil made a payment of 4500 Dirham to Dewan.
F227	6-Feb-06	Mail	Saragadam; Malvern Burnett; Michael Pol; Sachin Dewan	Saragadam sold his house to pay the second installment, and sent demand drafts made out to Michael Pol and Malvern Burnett to Sachin Dewan's office.
F228	7-Feb-06	Payment to Malvern Burnett	B. Joseph, Burnett	B. Joseph paid \$6,000 to Burnett via check, was told this would cover a green card for himself, his wife, and his two children.
F229	On or around February 15, 2006	In-person meeting at Trident Hotel in Kochi, India	Sachin Dewan, Michael Pol, Malvern C. Burnett and prospective migrant workers	Sachin Dewan and Malvern Burnett take second installment payments from prospective migrant workers.
F230	Mid-February 2006	Banking transactions in United States, India, and/or Dubai, UAE	Sachin Dewan, Dewan Consultants Michael Pol, Global Resources, Malvern Burnett, Burnett Offices, GCILC	Deposit of funds collected February 13-18, 2006 from prospective migrant workers in second installment fees.
F231	15-Feb-06	In person meeting at Trident Hilton Hotel, Kochi, Kerala, India	Pol, Burnett, Salimon, S. Dewan, Kaliyadan and other prospective workers	Dewan confirmed that Dewan Consultants and J&M were proceeding with the green card process for Kaliyadan and other workers, and accepted the second installment payments by Kaliyadan and others.
F232	16-Feb-06	Payment to Malvern Burnett	Kannithi, Burnett	Kannithi paid \$2,450 to Burnett via two checks of \$1,225 each.

F233	16-Feb-06	In-person meeting, Hilton Hotel, Kochi	Sachin, Salimon, Burnett, Pol, Varkey and other workers	Salimon, translating for Pol, told Varkey not to worry – that Varkey would get his work permit and be working in the United States by December 6, and that within eight months of his arrival, he would get his green card. Pol told Varkey that he would be paid \$20 per hour, and that food and accommodations would be free. Varkey paid his second installment.
F234	16-Feb-06	Second installment paid	Raghavan	Paid second installment of \$2,650.
F235	February – November 2006	Telephone calls	Saragadam; Sachin Dewan	Saragadam called regularly for updates and was always told that he would have to wait.
F236	March, 2006	In person meeting – Media City, Dubai	James, Sachin Dewan, Manish Dewan, Varuna Dewan, Michael Pol	Varuna called James to come to the office to sign documentation, which he did. Sachin told him to sign a paper for J&M which he had to do if he wanted to continue with his green card application, and James signed it.
F237	Mar-06	Payment, Dubai	Rodrigues, S. Dewan, Dewan Consultants	Rodrigues paid \$400 to Dewan Consulting.
F238	6-Mar-06	Payment to Pol	Pananjiklal, Pol	Pananjiklal paid \$1,250 to Michael Pol.
F239	6-Mar-06	Payment to Burnett	Pananjiklal, Burnett	Pananjiklal paid \$1,250 to Malvern Burnett.
F240	14-Mar-06	Payment to Malvern Burnett	Panicker, Malvern Burnett	Panicker paid \$1250 via check to Burnett, received a receipt stating the payment was “Advance fees for the process of Permanent Residence Visa.”
F241	14-Mar-06	Payment to Michael Pol	Panicker, Michael Pol	Panicker paid \$1250 via check to Michael Pol
F242	Apr-06	Skill Test	B. Joseph, Sachin’s brother Manish and a Signal employee	B. Joseph took a skill exam to be a pipefitter.
F243	Apr-06	Mails, or electronic mail (wires)	Dewan Associates in Dubai, UAE, Mumbai, India, or New Orleans, Louisiana to <i>Malayala Manorama</i> newspaper in Kerala, India	Transmission of advertisement (1) indicating permanent residence visa for welders and fitters to work in the United States; (2) promising \$112 - \$144 per day and a 2 year contract; (3) indicating that transportation would be provided; and (4) announcing dates of May 1,2,3 in Kochi for introductory seminars.

F244	Apr-06	Telephone	Pottirayil, Salimon	Pottirayil received a telephone call from Salimon about a new opportunity for a new company called Signal. He was told to forget about J&M, and that he would be sent to the United States on an H2-B visa. He was told that after working for Signal for two years, he would be able to get a green card.
F245	April and/or May 2006	Mails or electronic mail (wires)	Signal International, Malvern C. Burnett, Michael Pol, and Sachin Dewan	Transmission of video, photographs, and other materials for Dubai, UAE and Kochi, India seminars. Specific information regarding these communications is currently in the sole possession of Defendants.
F246	April and/or May 2006	Telephone, electronic mail (wires)	Signal International, Malvern C. Burnett, Michael Pol, and Sachin Dewan	Communications to plan and coordinate Dubai and Abu Dhabi, UAE, and the Kochi, India seminars. Specific information regarding these communications is currently in the sole possession of Defendants.
F247	April or May 2006	Electronic mail (wires)	Dewan Associates in Dubai, UAE, Mumbai, India, or New Orleans, Louisiana to <u>Daily Thanti</u> or <u>Dhina Thanti</u> in Tamil Nadu, India	Transmission of advertisement indicating permanent residence visa for work in the United States and announcing May 2006 introductory seminar.
F248	May, 2006	Telephone calls, in person meeting, Media City, Dubai	James, Varuna Dewan, James’ brother-in-law	Varuna called James to insist that he pay a second installment right away. James did not have the money and asked his brother-in-law, also in Dubai, for help. His brother-in-law paid the second installment for James, so that James incurred a debt to him.
F249	May-06	Payments, Dubai	Rodrigues, Global Resources, Burnett, Pol	Burnett made payments of \$1,225 to each Global Resources, Burnett and Pol at this time.
F250	2-May-06	Payment to Global Resources	Attayil, Global Resources	Attayil paid \$1,240 to Global Resources.
F251	3-May-06	Payment to Global Resources	Attayil, Global Resources	Attayil paid \$1,250 to Global Resources.
F252	9-May-06	Electronic mail (wires)	Dewan Associates in Dubai, UAE, Mumbai, India, or New Orleans, Louisiana to <i>Gulf News</i> in Dubai, UAE	Transmission of advertisement (1) indicating permanent residence visa for welders and fitters to work in the United States; (2) promising \$112 - \$144 per day; (3) indicating that transportation would be provided; and (4) announcing dates of May 14-15, 2006 in Dubai and May 16-17, 2006 for Abu Dhabi for introductory seminars.

F253	22-May-06	Electronic mail (wires)	Bill Bingle (Signal V.P.) and Michael Pol	Communications in email string between Bill Bingle and Michael Pol, in which Michael Pol drew distinction between green card candidates and other recruits
F254	May 27-31, 2006	Mails or electronic mail (wires)	Sachin Dewan in Mumbai, India to Salimon, likely in Chennai, India	Transmission of job application materials and written testing materials for distribution to and from prospective Signal employees at May 28-30, 2006 seminars.
F255	late May and early June of 2006	Mail, electronic transmission, and/or fax	Malvern C. Burnett, Gulf Coast Immigration Law Center L.L.C., and Law Offices of Malvern C. Burnett, A.P.C. (on behalf of Signal), the Mississippi Department of Employment Security, the Texas Workforce Commission, and the United States Department of Labor by mail, electronic transmission, and/or fax the completed forms ETA 750 and attachments seeking permission to import and hire 590 foreign guestworkers under 8 U.S.C. § 1101(a)(15)(H)(ii)(b), attendant regulations 8 C.F.R. § 214.2(h)(6) and 20 C.F.R. § 655.3, and associated administrative letters and/or guidance (commonly known as “the H-2B guestworker program”). In the applications to the state workforce commissions and forms ETA 750, Malvern C. Burnett and Signal stated that Signal would employ workers from October 1, 2006 to July 31, 2007, despite their knowledge that the projected labor need would be at least two-to-three years. Signal stated in letters of support to these applications that its need for H-2B guestworkers was “peak load and a one-time occurrence” and that “the temporary workers will work for the length of the prescribed dates of need, will be paid in accordance with the prevailing wage, and will return to their home country at the end of employment.” Signal executives and Malvern Burnett signed these applications swearing, under penalty of perjury, to the veracity of the information in these applications.	

F256	Jun-06	Newspaper ad	Ravi Rowthu	Rowthu saw an ad in <i>Eenadu</i> Telugu newspaper. The ad stated that they were looking for welders and pipe fitters.
F257	Jun-06	In person meeting	Rowthu, Sachin, Jenardlhnan, 2 Americans	Rowthu took a welding test in the presence of 2 Americans and then met with Sachin and Jenardlhnan in a large meeting. Sachin discussed an H2B visa which would take 3 months to process. Rowthu was told that within 3 months he would get a visa to come to the US. Rowthu gave 35,000 rupees at the first meeting to Jenardlhnan to start the paperwork process for an H2B visa. Sachin told them after the meeting the total cost would be between 6 to 8 lakh rupees depending on the paperwork process.
F258	2-Jun-06	Payment	Mail, Dewan	Mali paid 4,700 Dhs. to Dewan Consultants for an advance for I-140 processing.
F259	2-Jun-06	Mail, fax, or electronic mail (wires)	Bill Bingle (Signal V.P.)	Bill Bingle signed labor certification to USDOL under penalty of perjury stating that Signal expected to employ the foreign labor from Oct. 1, 2006 until July 31, 2007 (or ten months).
F260	June 12, 2006 and July 26, 2006	Mail, fax, or electronic mail (wires)	Bill Bingle (Signal V.P.), Thomas Rigolo (Signal Senior V.P.) and Malvern Burnett	Accompanying H-2B petitions for 110 welders and 190 fitters, Thomas Rigolo signed a letter to USCIS Vermont Service Center in St Albans, VT, which was prepared by Malvern Burnett. Accompanying H-2B petitions for 110 welders and 180 fitters, Bill Bingle signed a letter to USCIS in Vermont. The letters stated that the foreign labor would not become permanent members of the work force, and that they would be paid the prevailing wage and return to their home country at the end of the employment term.
F261	13-Jun-06	Mail, fax, or electronic mail (wires)	Thomas Rigolo (Signal Senior V.P.)	Thomas Rigolo signed labor certification to USDOL under penalty of perjury stating that Signal expected to employ the foreign labor from Oct. 1 2006 until July 31, 2007 (or ten months).
F262	July 20, 2006 and August 17, 2006	Mail, electronic transmission, and/or fax	The United States Department of Labor, Signal, Malvern C. Burnett	The United States Department of Labor sent approval notices to Signal and Malvern C. Burnett for Signal's labor certification applications for 590 H-2B workers for the period of October 1, 2006 through July 31, 2007.

F263	July 28, 2006 and August 25, 2006	Mail, electronic transmission, and/or fax	Malvern C. Burnett, Signal, Bill Bingle, Thomas Rigolo, the United States Citizenship and Immigration Service	Malvern C. Burnett on behalf of Signal filed with the United States Citizenship and Immigration Service by mail, electronic transmission, and/or fax the completed I-129 forms and attachments seeking 590 H-2B visas. In these H-2B visa applications, Signal attested to a 10-month labor need running from October 1, 2006 – July 31, 2007, although it knew its projected labor need was at least two-to-three years. Signal falsely represented to the government that at the end of this 10 month period, it intended to return all H-2B beneficiaries to their home country. Malvern C. Burnett declared that the applications were based on all information of which he had any knowledge despite the fact that he believed that Signal’s intentions for these workers exceeded ten months. Thomas Rigolo signed USCIS documents under penalty of perjury indicating Signal’s intent to employ foreign labor for only 10 months. Bill Bingle also signed a letter of support under penalty of perjury as an attachment to the applications.
F264	Mid-2006	In person meeting	Rowthu, Sachin	Rowthu met with Sachin two weeks after the first meeting, and was told by Sachin d that in 20 days he would be told if they were able to process his paperwork to come to the U.S. If not than he would lose the 35,000 rupees. Sachin stated to Rowthu that Signal was a good company with offices in Mississippi and Texas. Rowthu was told that he would get a green card after one year in the U.S., and after getting a green card he would be able to bring family and get good salary. Rowthu was told that he would be paid \$19.00 to \$19.50 per hour.
F265	Mid-2006	Payment	Rodrigues, Pol and Burnett	In 2006, Rodrigues paid \$1,225 by check to both Pol and Burnett. He was promised by Dewan that in addition to a green card, he would receive \$18 per hour and that this would include accommodations.

F266	Mid-2006	Newspaper ad, Chennai, India	Krishnan Kannayan	Kannayan saw a Dewan Consulting ad written in the Tamil language in Chennai. The ad stated that there was work available in construction in the United States.
F267	Mid-2006	Telephone, India	Kannayan and Salimon	Kannayan called the Dewan Consulting office after reading the ad and spoke to Salimon, who told Kannayan that the work in the United States would lead to a green card. Salimon invited Kannayan to a meeting at the Park Hotel in Chennai.
F268	Mid-2006	Kannayan, Salimon, Manish, Sachin Dewan and Michael Pol	In-person meeting at Park Hotel in Chennai.	Kannayan and other prospective workers were told by Sachin Dewan and Michael Pol that they would receive green cards after travelling to the United States to work. They were told that they would be required to make payments in three installments totaling approximately \$15,000. Kannayan signed an agreement saying that he would pay that amount in order to obtain a green card in the U.S.
F269	Mid-2006	Payment	Pottirayil, Salimon, Sachin Dewan, Michael Pol, the other gentleman with Michael Pol	Pottirayil was told the new opportunity would require: 65,000 rupees to Sachin Dewan, 65,000 rupee equivalent to Michael Pol, 65,000 rupee equivalent to the gentleman with Michael Pol, 60,000 rupees for the ticket, 5,000 to 14,000 rupees for the consulate fee, 40,000 rupees for the visa fee.
F270	Mid-2006	In-person meeting	Pottirayil, Signal representatives, Michael Pol	Attended a skills test in Chennai, involving a table interview with Signal representatives and Michael Pol.
F271	Aug-06	Phone call, letter	Kakkoth, Dewan Consulting	When Dewan contacted Kakkoth in Dubai in Aug. 2006, Kakkoth felt pressured to go to Madras immediately because Dewan told him that he needed to be in the U.S. by Dec. 2006; that the green card process takes time so it would be to his advantage to use the H2B Visa; and that there only a limited number of H2B Visas available. Because he felt pressured by Dewan, Kakkoth left his job in Dubai immediately and forfeited his salary for the ten years he had worked in Dubai. Kakkoth had to pay for his own plane ticket to India.

F272	Aug-06	In-person meeting, Dubai	Rodrigues, M. Burnett, S. Dewan	Burnett told Rodrigues in August, 2006 that in exchange for his payments, Rodrigues would go to the United States and work for Signal for ten months and then would get a green card for his family and himself
F273	Aug-06	Exchange of funds, Chennai, India	Kannayan, Burnett, Dewan Consulting, Michael Pol.	Kannayan paid an installment in the approximate amount of \$5,500 to Burnett, Dewan Consulting and Pol.
F274	Sep-06	Newspaper Ad, Dubai	K. Varghese	K. Varghese was working in Dubai and saw an ad in the Malayalam newspaper to work for Signal in the U.S.
F275	Sep-06	Telephone	Baby; Salimon	Salimon contacted Baby and informed him that the I-140 did not go through and that he could get an H2B visa to go to the United States. Salimon said that they would not return any of his money if he refused the offer. Salimon promised again that they would continue to work on his green card.
F276	Sep-06	Electronic mail (wires)	Dewan Associates in Dubai, UAE, Mumbai, India, or New Orleans, Louisiana to <u>Times of India</u> newspaper in New Delhi, India	Transmission of advertisement indicating green card and permanent employment opportunities in the United States for welders and pipe fitters.
F277	Sep-06	In-person, possibly on flight to India	Bill Bingle (Signal V.P.), Malvern Burnett	Malvern Burnett told Bill Bingle to not tell the U.S. Consulate that the work for the foreign labor was going to exceed ten months.
F278	September 1 and 2, 2006	Electronic mail (wires)	Malvern Burnett, Michael Pol, and Sachin Dewan	Malvern Burnett sent emails to Michael Pol and Sachin Dewan forwarding USCIS's notice of H-2B Visa approvals, indicating Defendants would financially gain from them.
F279	16-Sep-06	Electronic mail (wires)	Malvern Burnett, John Sanders	Malvern Burnett sent email to John Sanders stating that the U.S. embassy/consular staff cannot be advised that the foreign labor work would extend beyond 10 months.

F280	September and/or October 2006	Mails, or telephone, fax, and/or electronic mail (wires) between New Orleans, Louisiana; Mississippi; Texas; Dubai, UAE; and/or Mumbai, India	Sachin Dewan, Dewan Consultants, Michael Pol, Global Resources, Malvern Burnett, Burnett Law Offices, GCILC, Kurella Rao, Indo-Amerisoft, LLC, and Signal International	Discussions and transmission of materials related to transferring Indo-Amerisoft-sponsored green card applicants to Signal as sponsor; discussion of offering H-2B visas sponsored by Signal to green card applicants. Discussions and transmission of materials related to testing, H-2B processing and arrival of Indian H-2B workers at Signal International operations in the United States. Specific information regarding these communications is currently in the sole possession of Defendants.
F281	2006 (after September)	In-person Interview	Dewan, Burnett, Mali	Mali was interviewed/tested and was told he passed and that he would work for Signal.
F282	October, 2006	Telephone call	James, Varuna Dewan	Varuna called James to tell him that there was an opportunity to work for Signal International, which would be a smart thing to do because it would speed up his green card processing, and he would be able to go to the U.S. very soon and to bring his family. James could not wait any longer, because he had to start making money to pay off his loans, so agreed to go.
F283	Oct-06	Telephone	Kakkanthara, Salimon	Kakkanthara heard from his friends about a new opportunity and called Salimon to confirm. Salimon explained that he could go to the United States quickly on an H2-B visa, but that he would have to pay an extra 40,000 rupees.
F284	Oct-06	In person meeting	V. Babu, Michael Pol, Salimon, Sachin, and Malvern Burnet	V. Babu was given as skills test by Signal; after passing, he was told to interview the following day. V. Babu was told by Sachin he would have to go to the U.S. with H2B visa. He told him that after coming to the U.S. he would get processed for a green card.
F285	Oct-06	In person meeting, Abu Dhabi	Biswas, Dewan, Burnett, Rao	Biswas went to a seminar. Burnett, Rao, and Sachin Dewan were at the Dubai seminar. There were many other prospective workers in attendance, as well. Biswas was told he would be working for Signal on an H2B Visa, not a green card, but that Signal would start processing his green card once he started working in U.S. The job was described as a “golden opportunity.”

F286	Oct-06	Telephone	Devassy, Salimon	Around October 2006, Devassy received a notification that Katrina had taken place and that all of the papers at Malvern Burnett’s office were gone. Originally, Devassy was told that they would still file for his visa.
F287	Oct-06	In-person meeting in Chennai	S. Babu, Salimon, Dewan Consultants	Salimon called S. Babu to tell him that he was scheduled for an interview with the U.S. Consulate. Salimon told S. Babu to bring all the remaining cash and to pay the third installment before going to the Consulate. S. Babu paid the 3 Lakh in Rupees to Dewan Consultants prior to going to the Consulate. He took a bank loan and personal loans as well as using his wife’s gold to make the required payments. Salimon told him not to tell the Consulate about the money being paid or about the green cards, and S. Babu followed those instructions.
F288	Oct-06	Telephone	Devassy, Salimon	The recruiters changed their story and told Devassy that there would be a delay to go to J&M, but that there was a new opportunity to go to the U.S. through Signal International. They told Devassy that when he got to the United States either J&M or Signal would apply for his green card, but that he would first go to the U.S. on the H2-B visa. When Devassy agreed, Salimon told him that he would have to go to a testing in Chennai, to a U.S. consulate interview, and then to pay the final installment to Sachin Dewan in his Mumbai office.
F289	Oct-06	Mails, or telephone, fax, and/or electronic mail (wires) between New Orleans, Louisiana; Mississippi; Texas; Dubai, UAE; and/or Mumbai, India	Sachin Dewan, Dewan Consultants, Michael Pol, Global Resources, Malvern Burnett, Burnett Law Offices, GCILC, Kurella Rao, Indo Amerisoft, LLC, Signal International	Discussions and transmission of materials related to coordinating tests and recruitment of Indian workers in India and Dubai to work at Signal International, including recruitment materials and hiring letters from Signal International. Specific information regarding these communications is currently in the sole possession of Defendants.
F290	Oct-06	In-person meeting, Chennai, India	Devassy, Signal International	In October 2006, Devassy attended a skills test in Chennai with two Signal representatives.

F291	Oct-06	In-person meeting, Chennai, India	Devassy, Salimon	Devassy attended an interview at the U.S. consulate. In preparation for his interview, Salimon told him that he was to say he spend 32,000 rupees at the chance to go to the U.S., and that this was a traveling expense. His passport was then sent to Sachin Dewan.
F292	27-Oct-06	Chennai, India, in person meetings	James, Salimon, Sachin Dewan, Manish Dewan, Signal employees and other workers	James flew to Chennai and was told by Salimon to go to a testing center, which he did. There he passed a practical test for welders administered by a Signal employee.
F293	28-Oct-06	In-person meeting, Park Hotel, Chennai, India	James, Pol, Sachin Dewan	James met Pol and Dewan at the Park Hotel, where Sachin told James he had to pay a fee to the American Consulate for his interview and that he should see Salimon to set up an appointment for the interview.
F294	late October to mid-November 2006	Mails, or telephone, fax, or electronic mail (wires) between New Orleans, Louisiana; Mississippi; Texas; Mumbai, India; and/or Dubai, UAE	Malvern C. Burnett, Burnett Law Offices, GCILC, Michael Pol, Global Resources, Signal International, Sachin Dewan, and Dewan Consultants	Discussions and transmission of materials related to H-2B visa extensions and green cards for Indian H-2B workers at Signal and preparations for November 2006 meeting at Signal labor camp in Pascagoula, MS. Specific information regarding these communications is currently in the sole possession of Defendants.
F295	Late October or early November 2006	In-person meeting, Chennai	Kakkanthara, Sachin Dewan	Kakkanthara went to Chennai for a meeting and to take a skills test. Sachin Dewan explained that the H2-B visa would get workers to the United States to work for Signal, that it would be renewed two times, and that Signal would then file for a green card.
F296	October or November 2006	In-person meeting in Chennai, India	John, Signal representatives, Sachin Dewan, and representatives of Dewan Consultants	John attended a skills test in Chennai in preparation for Signal opportunity.
F297	Nov-06	U.S. consulate, Chennai	Rowthu, Sachin	Rowthu traveled to the U.S. consulate to obtain a visa after receiving a file from Sachin to take to the consulate.
F298	Nov-06	Telephone Call	Madhavan, Dewan	Madhavan's wife received a call from Salimon Dewan stating Madhavan needed to pay his last installment. Madhavan's wife took a 1 Lakh draft to Salimon Dewan and deposited \$5000 in a bank account for testing, as directed by Dewan.

F299	Nov-06	Salimon’s office, Chennai	Kavalamkuzhi, Salimon	Salimon told Kavalamkuzhi about a new opportunity for a company called Signal. He was told that he would be on an H-2B visa, but that it would be extended and they would continue processing his green card.
F300	Nov-06	In person meeting in Chennai	Dewan, Salimon, Burnett and Kaliyadan and other prospective workers	Prior to a scheduled meeting at the U.S. Consulate, Kaliyadan along with other prospective workers was coached by Dewan, Salimon and Burnett, who told them not to tell the U.S. Consulate about the money they were required to pay to get the Visa, not to say anything about the green card, and to say they planned to return to India by July 2007, instructions Kaliyadan followed with his meeting with the U.S. Consulate officials in Chennai shortly thereafter. Dewan also told Kaliyadan and others that the work would now not be with J&M but instead with Signal, on an H2B Visa, which would be converted to a green card after he arrived in the United States.
F301	Nov-06	Kerala, India	Madhavan, Pol	In November 2006, Madhavan took emergency leave from his job in Saudi Arabia to return to India; he did not return to the job in Saudi Arabia and gave it up to work for Signal. Madhavan met with Pol who said he would receive a visa to work for Signal for 9 months which could be continually extended, and that at the same time they would process his green card to work for J&M, to which he could switch as soon as the green card was issued; Madhavan was also given an address for a workshop in Chennai where he would be given a skills test.
F302	Nov-06	In person meeting in Chennai	Dewan, Salimon, Burnett and Arackal	Prior to a scheduled meeting at the U.S. Consulate, Arackal along with prospective workers was coached by Dewan, Salimon and Burnett, who told them not to tell the U.S. Consulate about the money they were required to pay to get the Visa, nor to say anything about a green card, and to say that they planned to return to India after working for several months in the U.S.

F303	Nov-06	Mails, telephone, and in person meetings in Chennai and Mumbai	U.S. Consulate, Arackal and Dewan agency in Mumbai	After the interview at the U.S. Consulate, at Dewan’s instructions, Arackal’s Passport and documents were mailed to the Dewan agency in Mumbai. Salimon told him that he would have to pay the final installment to get the documents back. Arackal had to borrow the money from a bank to make the final installment, adding to his substantial debt.
F304	Nov-06	In-person meetings; telephone calls	Saragadam; Sachin Dewan	In November of 2006, Saragadam heard rumors about people getting passports from Chennai. He called Sachin Dewan, who told him it was for a company called Signal, not J&M. Sachin Dewan recommended that he switch to Signal.
F305	Nov-06	In-person meeting; telephone	Baby; Sachin Dewan	Dewan informed Baby of his consulate interview and told him not to tell the consulate that he was paying for the opportunity to go to the United States. The consulate was instructed to send Baby’s passport to Dewan consultants.
F306	Nov-06	In person, Chennai	Biswas, Dewan, Signal employees	Biswas took a skills test in the presence of Dewan and two Signal employees.
F307	Nov-06	Telephone	A. Varghese, Salimon	Before A. Varghese paid the third installment, he got a call from Salimon in November 2006. Salimon asked if it was Mr. Abraham, and when he said yes he was told to call Dewan immediately.
F308	Nov-06	Telephone	A. Varghese, Sachin Dewan	A. Varghese called Dewan and was told that there was a new opportunity to go to the U.S., and that A. Varghese had to return to India immediately. When A. Varghese said that he wanted to work for a little longer in Dubai, Dewan said that this new opportunity was the <i>only</i> opportunity, and that A. Varghese could not later come whining to him that he paid a lot of money and never went to the U.S.
F309	Nov-06	Travel	A. Varghese	On Sachin Dewan’s instructions, A. Varghese quit his job in Dubai, sacrificing a bonus and paid travel back to India, and returned to India to pursue this new opportunity.

F310	Nov-06	In-person meeting	A. Varghese, Salimon	When back in India, A. Varghese visited Salimon at his house. Salimon told him that there was a new opportunity to go to the U.S., but not with Indo-Amerisoft. The company was now Signal International. A. Varghese immediately asked about the green card promises, and Salimon said: “Don’t worry about the green card or any of those things. All that will be taken care of. But you have to decide if you want to go now or if you want to wait for a future opportunity.” Salimon told A. Varghese that this new opportunity would require more money, a skills test, and an interview. The total A. Varghese would have to pay was 8 lakh rupees.
F311	Nov-06	Chennai	Madhavan, Signal representative, Sachin Dewan, Salimon Dewan	Madhavan traveled to a workshop in Chennai for a test of his skills as a welder. A work site surveyor for Signal International was present at the test. After the test, Madhavan went to the Park Hotel in Chennai where he met with Sachin and Salimon Dewan, who told Madhavan that he passed the test and could go back to Kerala to wait for a letter from the U.S. consulate.
F312	Nov-06	Telephone Call, U.S. Consulate	Madhavan, Salimon Dewan	In November 2006, Madhavan received a phone call from Salimon Dewan, who told Madhavan that Madhavan had an interview at the consulate but should first come to the Dewan office to be told what to do. Madhavan was given strict instructions not to tell the consulate how much Madhavan had paid for his visa or his visa would be denied and he would not receive a refund of his money. After the consulate approved his visa, Madhavan was told that Dewan would collect his passport and that Madhavan needed to travel to Mumbai with the rest of the money and he would be given his passport.
F313	3-Nov-06	In person meeting, Chennai	Peruvetil, Signal employees	Peruvetil took a skills test in the presence of three Signal representatives.

F314	8-Nov-06	In-person meeting, Chennai	Kakkanthara, Sachin Dewan	Dewan scheduled Kakkanthara’s consulate interview for November 8, 2006, and coached him to say that he had spent 33,000 rupees and nothing more. The passport was then sent to Dewan’s office.
F315	14-Nov-06	Letter from Dewan Consultants	Panicker, Sachin Dewan	Panicker received a letter from Dewan stating he had been selected after testing with Signal International, demanding payments of \$1460 each to Michael Pol and Michael Burnett. The proffered salary was \$14 to \$18 per hour for 40 hours per week on a nine month contract.
F316	Mid-November, 2006	In-person meeting, Park Hotel, Chennai	James, Salimon, Signal	At Salimon’s instruction, James met with Salimon at the Park Hotel right before James’ U.S. Consulate interview. Salimon gave James his file and an offer of employment letter on Signal letterhead. Although the signature block was for Bill Bingle, Signal Vice President of Production, the letter was actually signed in James’ presence by Salimon, on behalf of Signal. Salimon told James he should not say anything to the interviewer about monies he had paid for the Visa, or anything about a possible green card, or else he would not get his Visa approved. James did as instructed in the interview which he was told he passed. Sachin told James he would have to pay his third installment right away. James had to take another loan from his brother-in-law to pay the third installment, which his brother-in-law did by taking out another bank loan.
F317	Between mid-November 2006 and July 2007	Mails, or telephone, fax, or electronic mail (wires) between New Orleans, Louisiana; Mississippi; Texas; Mumbai, India; and/or Dubai, UAE	Malvern C. Burnett, Burnett Law Offices, GCILC, Michael Pol, Global Resources, Signal International, and Sachin Dewan	Discussions and transmission of materials related to H-2B visa extensions and green cards for Indian H-2B workers at Signal and representations to be made to workers regarding visa extensions and green cards. Specific information regarding these communications is currently in the sole possession of Defendants.

F318	16-Nov-06	In-person meeting, hotel in Chennai	Varkey, Sachin Dewan, Salimon, Burnett and about ten other workers	At this meeting, Dewan and the others prepped the workers for their upcoming visa interviews with the U.S. Consulate. Dewan told the workers to say that they have paid only 35,000 Rupees to the recruiting company for visa processing and travel expenses, and not to mention the large additional sums they have been required to pay. Dewan told the workers they would receive food and accommodations in the United States, and to tell the Consulate that they planned to stay in the United States only for eight months, after which their visas would expire. Burnett told the workers that he would process their green cards during those eight months, but they should not say anything about that during their visa interview. After the general meeting, Sachin told Varkey that in addition to his third installment, Varkey would have to pay 60,000 more Rupees for his airline ticket and additional service charges.
F319	29-Nov-06	Payment to Michael Pol	Attayil, Pol	Attayil paid \$1,460 to Michael Pol.
F320	Late November 2006	In-person meetings in Chennai	Saragadam; Sachin Dewan	Saragadam met with Sachin Dewan at the Green Park Hotel in Chennai and was given the date of his U.S. consulate interview. Sachin Dewan instructed him how to conduct the interview: he was told to say that he would return after his visa expired, and he was told not to say anything about the money he had paid.
F321	Late November 2006	In-person meetings in Chennai	Saragadam; Sachin Dewan; Sachin's brother; Michael Pol; Signal representatives	Saragadam was required to undergo a skills test in Chennai. He passed the test.
F322	November, 2006	In-person meeting, Chennai, India,	Murugaiyan, Dewan, Dewan Consulting	Prior to Murugaiyan's scheduled meeting with the U.S. Consulate, S. Dewan told him not to disclose to the Consulate how much he had been required to pay, or to say anything about his green card. He followed those instructions in his interview.
F323	November or December 2006	In-person meeting	Pottirayil, Sachin Dewan, Salimon	Pottirayil was coached about his consulate interview and said to tell the consulate that he paid 33,000 rupees and no other fees to get to the United States.

F324	Late November or early December 2006	Telephone	A. Varghese, Salimon	A. Varghese received a phone call from Salimon about a skills test in Kochi. A. Varghese had to pay 1,800 rupees for the skills test.
F325	Late November or early December 2006	Payment; In-person meeting, Chennai	A. Varghese, Salimon	A. Varghese paid 3 lakh rupees to Salimon in Chennai.
F326	Late November or early December 2006	In-person meeting, Chennai	A. Varghese, Salimon, Sachin Dewan, Signal International representatives	A. Varghese had to attend an interview in Chennai. He met with Signal International officers. Salimon and Sachin Dewan were there, as well.
F327	November 2006 through April 2007	Mails, or telephone, fax, and/or electronic mail (wires) between New Orleans, Louisiana; Mississippi; Texas; Dubai, UAE; and/or Mumbai, India	Sachin Dewan, Dewan Consultants, Michael Pol, Global Resources, Malvern Burnett, Burnett Law Offices, GCILC, and Signal International	Discussions and transmission of materials related to recruitment of Indian workers in India and Dubai to work at Signal International. Specific information regarding these communications is in the sole possession of Defendants.
F328	Late 2006	Telephone	Kainikkeril; Salimon	Salimon called Kainikkeril to tell him to pick up his plane ticket in Mumbai. When Kainikkeril mentioned that he did not yet have his passport, Salimon stated that Sachin Dewan had it.
F329	Late 2006	Payment, Mumbai,	Murugaiyan, Pol, Burnett, S. Dewan	Murugaiyan made his final payment of 310,000 Rupees, comprised of a check to Pol, a check to Burnett and cash to Dewan.
F330	Late 2006	In-person meeting in Mumbai	Kainikkeril; Salimon	Kainikkeril went to Salimon’s office and was informed that he would have to pay an additional 180,000 rupees, in cash, in order to collect his passport and ticket.
F331	Dec-06	Travel	S. Babu	S. Babu was sent from Mumbai via Chicago to Houston, where he was taken in a bus to Signal’s facility in Orange, Texas.
F332	December, 2006	Payments, Chennai, India	Kannayan, Dewan Consultants, Pol and Burnett.	Kannayan made additional payments to Dewan Consulting, Pol and Burnett in an amount in excess of \$10,000.

F333	Dec-06	Telephone	Devassy, Sachin Dewan	Devassy received a phone call from Sachin Dewan letting him know that his visa had been approved and that his travel date had been set. Devassy was told to go to Mumbai with the rest of the money.
F334	Dec-06	Payment	Devassy, Sachin Dewan, Michael Pol, Malvern Burnett	Devassy paid the third installment of 3 lakh rupees.
F335	Dec-06	Payment	Kakkanthara, Sachin Dewan	Kakkanthara paid the third installment, and then Sachin Dewan scheduled his flight to the United States.
F336	Dec-06	Air Travel	John	John flew from India to the United States, was picked up by Signal representatives at the airport in Texas, and taken to the Signal camp.
F337	December, 2006	Flight from Mumbai to Houston, bus to Orange, Texas	Murugaiyan	Murugaiyan was flown from Mumbai to New York to Atlanta to Houston, where he was picked up by bus by a man from Signal and taken to the Orange, Texas Signal facility.
F338	Dec-06	Air travel	Pottirayil	Pottirayil flew to the United States and arrived on December 18, 2006.
F339	December, 2006	In-person meeting, Chennai, India	Kannayan, S. Dewan, Pol	In a meeting at the Park Hotel in Chennai prior to Kannayan’s interview at the U.S. Consulate. S. Dewan and Michael Pol told Kannayan and others not to tell the Consulate anything regarding payments made to Dewan and others or anything about promises made to Kannayan and others about a green card. Kannayan followed these instructions when he had his meeting at the U.S. Consulate in December, 2006.
F340	Dec-06	In person meeting, Mumbai, Dewan’s office	S. Dewan, Salimon, Kaliyadan, other prospective workers	Before Kaliyadan arrived for the meeting, Salimon phoned to tell him he would need to pay an additional 100,000 rupees, in addition to the 165,000 otherwise due for the third installment. Kaliyadan had to sell his wife’s jewelry and borrow 250,000 rupees from money lenders to cover the required payments, placing him in substantial debt. S. Dewan took all his documents from him, including his passport. Kaliyadan flew from Mumbai to Houston along with approximately 30 other workers.

F341	Dec-06	In person meetings	Ravi (Signal camp boss), other Signal representatives, Kaliyadan and other workers	Ravi and other Signal representatives picked up Kaliyadan and other workers approximately three hours after they arrived in Houston. A Signal representative brought bank employees from Capital One into the camp for the workers to workers to open their bank accounts.
F342	Dec-06	Telephone	A. Varghese, Salimon	Salimon contacted A. Varghese and said that he needed to deposit 4,500 rupees to a bank called HDC for consulate fees. A. Varghese paid that amount.
F343	Dec-06	In-person meeting, Chennai	A. Varghese, Salimon	When A. Varghese paid the 4,500 rupees to the bank, he took the receipt to Salimon. Salimon filled out A. Varghese's paperwork and gave him an interview date with the consulate in Chennai. Salimon told A. Varghese to tell the consulate that he would return to India after a certain time, and that he was not paying for the visa but was paying 35,000 rupees for the flight ticket.
F344	Dec-06	Telephone, in person meeting at Dewan's office in Chennai, India.	Salimon, Baki	Prior to Baki's consulate interview, Salimon instructed him to meet with Salimon at Dewan's office, which Baki did. Salimon told Baki to tell the U.S. Consulate officials that he had not paid any money for the Visa, that he would only work in the U.S. for eight months. Salimon said that he should just tell the U.S. Consulate what they wanted to hear, and that his Visa thereafter be extended and that he would get a green card.
F345	Dec-06	In person meeting, mail	U.S. Consulate officials, Baki, Dewan Consultants	Baki had his consulate interview in Chennai in December 2006, after which he was surprised to find that his Passport with the stamped Visa at Dewan's instructions were sent directly to Dewan's office in Mumbai. Salimon told him he would have to go to Mumbai and pay the final installment in order to get his Passport.
F346	Dec-06	In-person	Indo-Amerisoft, Mali	Mali went to the Mumbai office where he was asked to pay a visa fee of 3-4,000 rupees which he paid. He was also instructed to go to the Delhi office and to the US Embassy.
F347	Dec-06	Arrival at Orange, Texas facility	Pappachan, Signal employees	Pappachan arrived in the US and went to the Orange, TX facility.

F348	Dec-06	Payments	K. Varghese, Dewan, Salimon, Burnett, Pol, Rao	K. Varghese paid: 7 lakh to Dewan; 260,000 rupees to Rao (in cash); 20,000 rupees to Salimon (as an advance); \$740 to Malvern Burnett (12/19/2006); \$2,490 to Michael Pol (12/19/2006); 1,500 rupees for medical examination
F349	Dec-06	Telephone	Kutty; Sachin Dewan	Kutty left India for the United States in December 2006 and connected in New York City; Sachin set up the flight from New York to Texas, but demanded an additional 33,000 rupees for the plane ticket.
F350	Dec-06	In-person meetings	Kutty; Signal employees	Kutty began work at the Orange, Texas Signal camp in December 2006. He endured terrible conditions, including 20 workers living in the same trailer, with one bathroom for all 20 persons. The rules in the camp were very strict, including governing when workers were allowed to eat and what they were allowed to bring into the camp.
F351	Dec-06	Telephone call	Saragadam; Sachin Dewan	Saragadam was called by Sachin Dewan to tell him his flight information, and to state that Saragadam was to bring the rest of his required payments to Mumbai. The final payment was to be 3 lakhs and 40,000 rupees.
F352	Dec-06	In-person meeting	Baby; other workers	Baby arrived in the United States in December 2006 with 30-60 other workers who were to begin work in Orange, Texas.
F353	Dec-06	In-person meeting	Baby; Signal representatives	Baby worked at the Signal Camp in Orange, Texas. After arriving the Signal representatives conducted a second skills test, which they said that Baby failed. He did not work for one month, but after a month was worried about the debt that he had back in India. He began working as a pipefitter for Signal at \$10.50 per hour.
F354	Early December, 2006	Telephone, in-person meeting, Seashell Hotel, Chennai	Salimon, James	Salimon gave James a ticket for a flight to Chennai to Mumbai and told James he would get his passport and ticket to America from the Mumbai office of Dewan, as long as he had no outstanding balance on his payments.
F355	6-Dec-06	Payment to Malvern Burnett	Panicker, Malvern Burnett	Panicker paid \$1460 via check to Burnett

F356	6-Dec-06	Payment to Global Resources	Panicker, Michael Pol	Panicker paid \$1460 via check to Global Resources
F357	December 8-11, 2006	Air Travel	Kakkanthara	Kakkanthara flew from India, to New York, to Atlanta, and then to Houston.
F358	9-Dec-06	In-person meeting, Sachin's office in Mumbai, India	Varkey, Sachin Dewan, other Signal employees and other workers	Varkey went to Sachin's office in Mumbai and paid the third installment, plus the additional 60,000 Rupees. Sachin told Varkey that Varkey had a permanent job with Signal which included free food, accommodations and transportation, and that Pol and Burnett would take care of his green card. Sachin ripped up the documents that Varkey had brought with him and made Varkey sign some other documents in English (which Varkey did not understand), then gave Varkey his passport and airline ticket.
F359	December 9-10, 2006	Flight to America, Orange, Texas	Kakkoth, Signal employees in Orange, Texas	Kakkoth flew to America with 25 other workers, arrived at Signal camp in Orange, Texas where he met Rao, the camp boss, and Tony, the foreman.
F360	10-Dec-06	In-person meeting, Mumbai	Sachin Dewan, Manish Dewan, James, other workers	In Mumbai, Sachin told James that he had to give Sachin money for the plane ticket, which James had not been aware of before, and he had no money. Sachin said that if James did not pay, he could not go to the United States. Through Manish, James was able to contact his brother-in-law who by the end of the day was able to borrow additional money for the plane ticket. While in the Dewan Consultants office that day, James observed another worker telling Sachin that he wanted his money back and did not want to go to the United States. Sachin told that worker that if he did not pay the last installment, Sachin would break his knees and burn his passport. James felt as if he were in a huge trap, and all he could do is fly to the United States and try to work to pay off his loans. Sachin told James not to dig his own grave by making any complaints while he was at Signal.
F361	10-Dec-06	Flight to America, via Kochi, Mumbai, Atlanta, and Houston to Orange, Texas	Peruvetil, Signal employees in Orange, Texas	Peruvetil flew to America and was taken from the Houston airport to the Signal Camp in Orange, Texas

F362	December 10 – 11, 2006	Travel	Varkey, Dewan Consultants employees, Signal employees,	Varkey flew from Mumbai to New York to Atlanta to Houston, and his group was met by Signal employees in Houston for a bus ride to Orange, Texas
F363	December 11, 2006 – June, 2007	In-person meetings, Signal’s Orange, Texas facilities	Varkey, Signal employees, other Indian workers	Varkey worked at Signal’s Orange, Texas and Port Arthur facilities during this time period, residing at the Orange, Texas man camp. Conditions were terrible, with 24 people in a container in small bunk beds that were extremely close together. Only two toilets and two showers for the group. It was very difficult to sleep because people worked different shifts. It was like being in a jail – the security guards would frisk them and search their belongings. The food was very bad and often spoiled. Varkey and others got food poisoning. Varkey heard about an attempt by one Sabulal at the Mississippi camp to commit suicide, on being threatened with deportation upon complaining. All of the workers were very intimidated about complaining about conditions. The foremen and supervisors discriminated against Indian workers, who had to work in smokier and less safe conditions than other workers.

F364	December 11, 2006 – June, 2007	In-person meetings, Orange, Texas	James, Signal employees, camp bosses and foremen, other Indian workers	James worked at the Orange, Texas Signal camp during this period. Conditions were terrible. Twenty-two men lived in very small bunk beds in a single container, which included only one bathroom with two toilets and two showers. The food was terrible, often spoiled, with James and other workers getting sick. \$245 per week was deducted from James’ paychecks, whether or not he was living at the camp or eating the food, and whether or not he had enough work to do to offset the expense. Camp guards monitored their workers closely as they left and entered camp, treating them like criminals. Sleeping conditions were impossible, with different workers in the cramped containers working different shifts. The superintendents and foremen made it clear that they did not like the Indian workers, to whom they gave the worst jobs and no work (for no pay) when work was not available for all the Indian and other workers – when it was raining, for example the Indian workers were allocated the “outside” jobs, for which work was not available on a rainy day, and the other workers got the inside jobs.
F365	Dec-06	In-person meeting, Orange, Texas	Kakkanthara, Signal representatives	When Kakkanthara arrived he was picked up by Signal representatives, including a man named Ravi. He was forced to pay \$250 per week, deducted from his paycheck, for food and lodgings. The conditions were terrible—18 to 24 people per trailer, with little to no sanitation around the bathroom facilities. Kakkanthara often got sick from the food, and one time had to go to the hospital. He was told that he was suffering from food poisoning.
F366	12-Dec-06	U.S. Embassy	Biswas, Dewan	Biswas received his H2B Visa at the embassy. Sachin kept his passport and Visa until Biswas had paid the full amount. Biswas felt threatened.
F367	12-Dec-06	Air travel	Devassy	Devassy flew to the United States.

F368	December 12, 2006 – March 13, 2008	Orange, Texas	Peruvellil, Signal employees in Orange, Texas	Peruvellil worked at the Orange, Texas camp during this period. He was living in a container with 22 people in one container. There were day shift and night shift people living in the same quarters. They had to hang their clothes which were dirty in the bunk beds. It smelled. The food was very bad. He got sick and was hospitalized because of the food twice.
F369	13-Dec-06	In person meetings, Mumbai	Arackal, Salimon’s wife, Dewan, others at Dewan Consultants.	Salimon’s wife gave Arackal a plane ticket to Mumbai. When he arrived there, Dewan and someone else from Dewan Consultants told Arackal he did not need his paperwork and he should give it all to Dewan, which he did. Arackal then flew from Mumbai to New York to Houston.
F370	13-Dec-06	Flight to America, Orange, Texas	Attayil, Signal employees in Orange, Texas	Attayil flies to America, arrives at Signal camp in Orange, Texas where he meets Jose, the foreman.
F371	13-Dec-06	Flight to America, Orange, Texas	Panicker, Ravi, Signal employees in Orange, Texas	Panicker flew to America and was taken to the Signal camp in Orange, Texas by camp manager Ravi, along with 25 other workers.
F372	December 13-14, 2006	Travel to America	Rowthu, Signal employees including Ravi Reddy	Rowthu traveled from Mumbai to New York, Houston, and then to the Signal Camp in Orange, Texas where he was met by the camp boss, Ravi Reddy
F373	14-Dec-06	In-person meeting, Chennai	A. Varghese	A. Varghese went to a consulate interview and found out that he had failed the test.
F374	14-Dec-06	In-person meeting, Chennai	A. Varghese, Salimon	After A. Varghese failed the consulate test, he went to Salimon. Salimon told him to see him later at his house. At Salimon’s house, Salimon told A. Varghese that he failed because he was not married. He told A. Varghese to go back to the bank, to pay another fee for another interview, and then to falsify a marriage certificate and wedding pictures.

F375	14-Dec-06	Orange, Texas	Panicker, Susan Carlquist, Ravi, Ricardo, Signal employees in Orange, Texas	Panicker began work at the Orange, Texas camp as a pipefitter during this period. The food was very bad, they were kept inside a fence and made to pass through security checks. Though paid the promised amount, he had \$225 per week deducted for food and accommodation, which did not leave enough to pay off his debts.
F376	Mid-December 2006	Telephone	A. Varghese, Salimon	A. Varghese later called Salimon and told him that he did not feel right about falsifying that information and that he would not do it. Salimon told him that it was the only way. He told A. Varghese that he would take care of it, if A. Varghese could provide him with stationary from his church and any wedding picture.
F377	Mid-December 2006	In-person meeting, Orange, Texas	Devassy, Signal International	Devassy arrived in Houston and a Signal company bus too him to the Signal camp, which is where people both lived and worked. Workers lived in containers with up to 20 people in each tiny space. The food was very bad. Nonetheless, Signal International deducted \$245 out of Devassy's paycheck every week for food and accommodations. The living conditions in the camp were very restricted. He could only leave when Signal provided transportation, and he had to come back when their transportation came back. Otherwise he wasn't allowed to leave.
F378	Mid-December 2006	In-person meeting, Chennai	A. Varghese, Salimon	A. Varghese found stationary from his church and his sister's wedding picture and gave it to Salimon. Salimon prepared a false letter from the church and altered the photograph to look like A. Varghese's wedding.
F379	Mid-December 2006	In-person meeting	Saragadam; Sachin Dewan; Sachin's brothers; Manish	Saragadam met with various defendants at Sachin Dewan's office, but Sachin asked for an additional 20,000 rupees. Saragadam said that he did not have anymore and Sachin accepted what he had. Sachin then made him sign many documents that were in English only.

F380	December 15, 2006 – July 31, 2007	In person meetings, bank transactions	Arackal, Signal employees in Orange, Texas	Arackal worked at the Orange, Texas camp during this period. Conditions were terrible. Twenty one to twenty three people shared a room, with only two bathrooms and very little room to move inside. Money (\$245 per week) was deducted from Arackal’s paycheck for food and lodging, and the food was often spoiled. Arackal heard about a suicide attempt at a Mississippi Signal plant and heard that Signal would send workers back to India who did not follow instructions.
F381	16-Dec-06	Mumbai	Madhavan, Salimon Dewan, Sachin Dewan	Madhavan traveled to the airport in Kerala and received a ticket to Mumbai from Salimon Dewan as well as the address to Sachin Dewan’s office in Mumbai. There were approximately 40 other workers with him, some traveling to Texas and some to Mississippi.
F382	December 16, 2006 – April 13, 2007	In-person meetings, Orange, Texas	Murugaiyan, Signal employees, other workers	Murugaiyan worked at the Orange, Texas facility during this period. Living conditions at the man camp were terrible with 17 multi-shift people in bunk beds in the small trailer Murugaiyan lived in. There was only one bathroom inside and the accommodations were filthy. The food was terrible. The working conditions were very hard, and the Indians were given harder work than other ethnic groups, and were threatened that they would be sent home if they did not perform the work. \$245 was deducted from his paycheck weekly for room and board, and he was told that that would be deducted even if he tried to live off campus. On April 13, 2007 Murugaiyan simply left the camp because he couldn’t sleep or eat the food, even though he recognized a risk given his immigration status.
F383	December 17 or 18, 2006	Mumbai	Madhavan, Sachin Dewan	Madhavan paid the final installment in cash at Sachin Dewan’s office, using U.S. currency for Pol and Burnett and Indian currency for Dewan. Dewan gave Madhavan his passport and a plane ticket to America.

F384	17-Dec-06	Orange, TX, Port Arthur	Rowthu, Signal employees including Ravi Reddy	Rowthu started work after completing paperwork and taking a safety test. He worked the night shift from 6pm to 6am, and would work 10 day shifts at Port Arthur. He lived in a trailer with 24-25 to the unit, with one dirty bathroom. The trailer housed both day and night shift workers so that no one was able to get sleep. The canteen provided food that smelled bad. The workers went to management to talk about the food issues and management told Rowthu that they only came here to work. The food was cold, old, and made Rowthu sick. He was only allowed one hour on Sundays to travel to Wal-Mart to purchase food, and was questioned as to why he was taking food from the canteen if he was also purchasing food. Rowthu worked for 8 months before he was told by Signal that he was not doing a good job and to look for another job.
F385	18-Dec-06	Arrival	Raghavan, Signal	Raghavan arrived in Chicago; took a Signal bus to Texas.
F386	18-Dec-06	Air travel, Mumbai, India to Houston, Texas and bus travel to Orange, Texas	Kannayan	Kannayan left Mumbai, India on December 18, flew through Frankfurt, Germany and then to Houston, from where he was taken by bus to the Signal camp, arriving December 19, 2006.
F387	18-Dec-06	Flight to America	Madhavan, Signal employees	On December 18, Madhavan flew from Mumbai to Chicago to Houston, where he was met by a Signal bus driver and Ravi, the Signal camp boss, who drove him to the Signal Camp in Orange, TX.
F388	18-Dec-06	Travel	Saragadam, Signal	Saragadam flew from Mumbai to the United States and to Orange, Texas.
F389	21-Dec-06	Work begins	Pappachan, Signal	Pappachan worked from December 2006 through November 14, 2007
F390	22-Dec-06	U.S. Consulate	V. Babu, Sachin	V. Babu went to the U.S. consulate for his visa interview. Beforehand, he was told by Sachin to say that he was only charged 5500 rupees to process paperwork.

F391	December 22, 2006 to March 2008	Orange, Texas	Madhavan, Signal employees in Orange, Texas	Madhavan began work at the Orange, Texas camp during this period. Madhavan was paid \$18 per hour but had around \$300 deducted each week for accommodations; he had been told in India by Dewan that food and room would be provided and there would be 2 or 4 people to a room. Instead, at the Signal camp there were at least 18 people living in container type rooms with a single attached bathroom and 1 common bathroom. The food quality was degrading, with only one type of food prepared no matter where the workers came from; when they complained, Ravi told them to either get adjusted or they would be sent back to India. Madhavan would often purchase food outside of the camp with his own money, but still had the weekly deductions taken from his paycheck.
F392	26-Dec-06	Flight to America, Orange, Texas	George, Ravi, Signal employees in Orange, Texas	George flew to America via Mumbai, Frankfurt, Chicago, and Houston and was taken to the Signal camp in Orange, Texas.
F393	December 28 or 29, 2006	In person	Venugopal, Signal	Signal gave Venugopal a skills test the day after he arrived in the United States.
F394	30-Dec-06	Third installment paid	Raghavan, Burnett, Pol, Dewan	Raghavan was told that there were lots of other people who were willing to pay the higher amount, and he was afraid that he would lose his first and second installments if he didn't pay the higher amount in the third installment. So he paid \$740 to Burnett, \$740 to Pol and 4 lakh to Dewan.
F395	31-Dec-06	Payment to Dewan Consultants	Kannithi, Dewan Consultants	Kannithi paid 1,500 dirhams to Dewan

F396	Dec-06	Orange, Texas	Kakkoth, Signal employees in Orange, Texas	Kakkoth began work at the Orange, Texas camp during this period. He lived in a container with bunk beds for 6-7 months with 20-22 people and just two bathrooms. \$250.00 per week was deducted from his paycheck for food and accommodations. He was provided with South Indian-type food, but nutritional value was minimal (no vitamins, etc.). Because he worked the night shift, he wasn't always able to get meals, so he would go to Wal-Mart and shop for food, but he had to pay for that food himself.
F397	December 2006 to October 2007	In-person meeting, Orange Texas	Devassy, Signal International	Signal informed the workers that their performance would be reviewed regularly. Because of the terrible conditions, however, Devassy did not get enough rest or sleep, and he was not performing very well. The workers were told that if they did not perform, they would lose their job, get kicked out of the camp, and be deported.
F398	December 2006 through 2007	In-person meeting, Orange, Texas	Kakkanthara, Signal representatives	Signal held between 6 and 7 meetings at the camp during which Signal representatives discussed the living conditions and the possibility for green card filings. The workers were told that Signal would take care of them, and that the living conditions were fine.
F399	December 2006 to March 2007	In-person meeting in Orange, Texas	John and Signal representatives	John worked in the Signal camp in Orange, Texas from December 2006 to March 2007; he was required to pay \$250 per week for food and housing, though the housing was in terrible conditions; he repeatedly became sick from the food.

F400	December, 2006 – July, 2007	In-person meetings, Orange, Texas	Kannayan, Signal employees, other workers	Kannayan worked at the Signal facility in Orange, Texas for seven months. Living conditions in the “man camp” were deplorable, with far too many people crowded in a single trailer, bunk beds with two to a bunk. The living spaces were not clean and so confining that it was like being in jail. The food was terrible. Kannayan felt treated like a criminal. He was sick several times. The Indians were treated much worse than other ethnic groups at the work site. The Indian were called “pigs” by the supervisors and were told they deserved to be treated badly. Signal deducted approximately \$350 per week from Kannayan’s pay to cover room and board and other charges. In July Signal proposed to transfer him to the Mississippi camp, but the experience with Signal was so terrible Kannayan simply left.
F401	December 2006 – July 2007	Worked in Texas	Raghavan, Signal	Raghavan worked at the Texas camp until his visa expired in July 2007. Then he was sent to the Mississippi camp. There were 24 people to a trailer. It was so hard to sleep that sometimes he would sleep in the recreation center. Lots of rats and mice. His bed was by the door and during rainy season it would get wet constantly. He contemplated suicide.
F402	December 2006 – August 2007	In person	Venugopal, Signal	Venugopal worked the day shift in a piping shop of the Orange, Texas camp from 6:30 am to 4:30 pm every day under an H2B Visa. He was paid about \$450.00 per week. He lived in a Signal trailer that was surrounded by a fence. The food was very bad. There were 22 people in one room and 2 bathrooms. He had to pay \$1250 a month for these accommodations.
F403	December 2006-2007	In-person meeting	Baby; Signal representatives; other workers	Baby lived in terrible conditions at the Signal camp in Orange, Texas. He lived in a trailer with 24 other workers. There was no freedom in the camp, and security would check their bags and their persons when the returned from outside the camp.

F404	December 2006 – March 2008	In person meetings, Orange, Texas	Kaliyadan, Signal employees, other workers	<p>Kaliyadan worked in the Orange, Texas camp during this period. Conditions were deplorable, with 24 men living in Kaliyadan’s trailer, in which there was not even room to stand. There were only two toilets and four showers for the trailer, and the stench was terrible. Kaliyadan worked in the day shift, but others in the camp worked other shifts, so it was impossible to sleep. Room and board were deducted from his salary at \$245 per week. He was told by Signal that this amount would be deducted regardless of whether he tried to move, which meant it was impossible for him to move. The food was very difficult to eat, and occasionally it was spoiled or rotten. There were American and Mexican workers at the plant, but only the Indians were required to live in the camp. Burnett several times told Kaliyadan not to worry about his green card, that all would be taken care of. Ravi told Kaliyadan not to make trouble, or he would be deported.</p>
F405	December 2006 – January 2008	In-person meetings, Orange, Texas	S. Babu, Signal employees, other workers	<p>S. Babu worked at the Orange, Texas facility during this period. He lived in a trailer with approximately 22 other workers, two to a bunk with one shower and bathroom. S. Babu was unable to sleep because of the conditions and because he was stressed about the money he owed in India. His debts left him with no choice but to work as much as he was able to.</p>
F406	2006-2007	In-person meetings in Orange, Texas	Saragadam; Signal employees	<p>Saragadam was stationed at the Texas camp in Orange, Texas. He was subjected to terrible living conditions, including living in a trailer with 20 other workers. A Signal representative spoke to the workers and stated that if anything happened, they would not get their money back and would be sent back to India. A weekly payment of approximately \$250 was to be deducted from their paychecks every month for living expenses. The food was very bad and Saragadam even had to go to the doctor because of stomach problems due to spoiled food.</p>

F407	2007	Telephone, In person	F. Joseph, Pol, Burnett, Dewan	About a year after F. Joseph made the initial payment of 2,000 Dirhams to start the paperwork, he was contacted by someone from the office who told him that his labor approval was done, so he needed to pay a second installment. He went to the office to pay and Pol and Burnett were both there. He paid another three payments of \$1250 each. In total, Joseph paid a total of \$11,250 USD and 4,500 Dirhams to Pol, Dewan and Burnett, broken down as follows:\$3750 = 3 X \$1250 to Pol, Dewan and Burnett (first installment); \$3750 = 3 X \$1250 to Pol, Dewan and Burnett (second installment); \$3750 = 3 X \$1250 to Pol, Dewan and Burnett (third installment)
F408	2007	Telephone, In person	F. Joseph, Dewan, Rajesh, Burnett	F. Joseph was contacted by an agent for Dewan Consulting named Rajesh who told him that he would go work for Signal instead of J&M, but that the program would be the same. At that time, they told F. Joseph that instead of a green card, he would receive an H2B visa. They explained to him that this was a 9 month visa which could be renewed up to three times. He understood that Burnett represented Signal and Dewan Consulting, and Burnett told him that while he worked under the renewed H2B visas, they would process his paperwork for a green card. He was told that the reason that he was receiving this visa instead of a green card was because the green card would take a very long time. Rajesh promised Joseph 27 months of work with Signal, a renewable H2B visa, and a green card at some point in the future. He never received any record that his H2B visa had been filed for an extension, but everyone was told that their visa was extended.
F409	2007	Hires Immigration Attorney through Burnett	Pappachan, Ram Cherath, Burnett	Burnett recommended Ram Cherath as an immigration attorney for Pappachan. Pappachan paid Cherath \$3500 and Cherath secured him a 485 visa.

F410	2007	In-person meetings in Orange, Texas	Kainikkeril; Signal employees	Kainikkeril arrived in the Signal camp in Texas in February of 2007 and was given a skills test for a pipefitter. He passed and was given a job. He lived in terrible conditions, being forced to pay \$250 per week to live with 22-24 other workers in one trailer.
F411	Jan-07	In person meeting in Delhi	S. Dewan, Singh	Singh met with S. Dewan prior to an interview at the U.S. Consulate. Because Singh's mother had died, and because Singh was beginning to have doubts about the enterprise, Singh asked M. Dewan if he could get his money back, and M. Dewan told him he could not get his money back and should take the opportunity. Dewan told him to say that he would be coming back to India when his work visa with Signal expired, which is what Singh did when he spoke to the consulate officials shortly thereafter.
F412	Jan-07	In person meetings, Houston and Orange, Texas	M. Dewan, Ravi, Singh	Singh was flown from Mumbai to London to Houston with about 40 other workers. Some went to Mississippi and others, including Singh, went to Orange, Texas. Ravi, the Orange, Texas camp boss, met them at the airport.
F413	Jan-07	Telephone, in person meeting	Baki, Salimon, S. Dewan, other Dewan Consultants' employees and other prospective workers	Baki was telephoned and told it was time to go to the United States and that he should first go to Mumbai and pay the final installment of 238,000 rupees. Dewan told Baki that if he were not interested in going to the U.S., there were other people who were and they would simply give his ticket to someone else who was willing to pay. Furthermore, Baki was informed that if he tried to back out, he would not get much of his money back. Because of this, Baki felt pressure to pay the money right away, which he did. Baki was given his Passport three days later.

F414	Jan-07	Orange, Texas	Attayil, Signal employees in Orange, Texas	Attayil began work at the Orange, Texas camp during this period. Conditions were terrible. Twenty four people shared a trailer, with just one emergency bathroom in the trailer and eight toilets and showers for all of the camp employees. Attayil heard about Indian workers in Mississippi who were put in jail for lack of documentation, heard about a suicide attempt at a Mississippi Signal plant, and heard that Signal would fire Indian workers first if there was not enough work.
F415	1-Jan-07	Orange, Texas	George, Ravi, Signal employees in Orange, Texas	George began work at the Orange, Texas camp as a pipefitter during this period. The conditions were very poor, with 20 people living in one container, no lock or privacy, and only one shower and one toilet in the container. The shower did not have a curtain. The food was very bad, and no food was allowed after 8pm for workers on the day shift. They were made to pass through security checks. They were never provided overtime, unlike non-Indian workers.
F416	Jan-07	Phone call, letter	Kavalamkuzhi, Dewan	Kavalamkuzhi was informed that he was going to fly out of Mumbai at the end of the month and that he needed to pay the final installment. Before Sachin would return Kavalamkuzhi's passport, however, Kavalamkuzhi was required to return all of the original documents about the J&M opportunity.
F417	Jan-07	Payment	Kavalamkuzhi, Dewan, Burnett, Pol	Kavalamkuzhi paid 60,000 rupees in cash to Dewan and in drafts to both Burnett and Pol.
F418	Jan-07	In-person meeting in Mumbai	Kainikkeril; Sachin Dewan; Dewan's brother	Kainikkeril went to Sachin Dewan's office and was asked to sign papers that were all in English; the staff would not translate or give them time to read the papers. Sachin Dewan's brother told Kainikkeril that he needed an additional 100,000 rupees before he would be allowed to go to the United States. The Dewan brothers threatened to keep and possibly destroy Kainikkeril's passport if he did not pay the remaining fees, and Kainikkeril said that he would get it.

F419	Jan-07	In-person meeting in Mumbai	Kainikkeril; Sachin Dewan	When Kainikkeril explained that he did not have the money, Sachin Dewan stated that he would burn or tear the passports. Kainikkeril got on his knees and begged Sachin Dewan, who would not change his mind. After several weeks, Kainikkeril was able to scrape together the money for Sachin Dewan.
F420	4-Jan-07	In-person meeting, hotel in Chennai, India	S. Dewan, Salimon, Dewan Consulting and Rodrigues	Rodrigues met with S. Dewan and Salimon prior to his interview at the U.S. Consulate. Dewan and Salimon told Rodrigues to say nothing about the money he was required to pay and to say nothing about the green card, instructions which he followed in his interview.
F421	18-Jan-07	Payment	Rodrigues, Pol, Burnett and Salimon	Rodrigues made required payments of \$2,685 each to Pol and Burnett at this time, and presented checks to them with Salimon in attendance.
F422	22-Jan-07	In person meeting, Chennai hotel	Veetil, Salimon	The day before his meeting at the consulate, Veetil met with Salimon at the hotel in Chennai. He was instructed by Salimon not to say anything regarding payments made to get his green card. He was told to pick up his passport in the Mumbai office. He was told by Salimon after passing his passport that he would have to pay an extra 2.5 lakh which includes third installment, and that was the only way he could get the passport. Veetil recalls getting into an argument about his insecurity regarding the green card process. He was told that Signal would be sure to get him his green card.
F423	25-Jan-07	Flight to America, Orange, Texas	B. Joseph, Ravi, Signal employees in Orange, Texas	B. Joseph arrived at Signal camp in Orange, Texas and began working within 3 days of his arrival. The Signal camp boss was named Ravi. He was paid \$18.95/hour but charged \$245 per week for room and board. He was not allowed to go to church or to drink. The bunker he lived in contained 20 bunk beds with two bunks per bed, 4 showers and 2 toilets. The bunker smelled bad, food was bad and caused digestive problems, and water was out of the tap. B. Joseph complained about the food and conditions to Ravi.

F424	25-Jan-07	Payment to Malvern Burnett	Kannithi, Burnett	Kannithi paid \$1,460 to Burnett via check for “green card processing fee.”
F425	25-Jan-07	Payment to Michael Pol	Kannithi, Pol	Kannithi paid \$1,460 to Pol via check for “green card processing fee.”
F426	26-Jan-07	Flight to America, Orange, Texas	Mathew, Ravil, Signal employees in Orange, Texas	Mathew flew to America via Dubai, London, Miami, and Houston, and was taken to the Signal camp in Orange, Texas by camp manager Ravi, along with 36 other workers.
F427	January 2007 to April 2007	In-person meeting	Pottirayil, Signal representatives	Pottirayil began work at Signal International in Orange, Texas on January 10, 2007. He was forced to pay \$250 per week, deducted from his paycheck, for food and lodging. The conditions were terrible and Pottirayil lived with 23 other people in a trailer. Each bunk bed was identified only with the employment ID number that Signal provided for them. Pottirayil was required to work in very hot conditions, near a core that would get to between 300 and 400 degrees. When he could not take the heat and took a break, a Signal foreman called him over and said: “Motherfucker why aren’t you working?”

F428	January 26, 2007 through January 2008	In person	F. Joseph, Signal	<p>F. Joseph worked the night shift at Signal and lived in the trailer camp in Orange, Texas. The main accommodation was 22 people in a small trailer home. There was one small bathroom that an average person had difficulty using because of its size. This bathroom had a wash basin, water closet and showerhead. There was a sink outside of where they slept. Half of the people in the trailer worked day shift and half worked night shift, so there was lots of coming and going. He slept very close to the wash basin and the noise, the smell, the spray of water kept him from being able to sleep. Many people worked on the rig so they were covered in oil and sweat and they had nowhere to put these clothes so they kept them under the beds. The top bunk was so close to the ceiling that he couldn't sit up to read or write a letter. Nobody was allowed to go outside the camp to live. The food quality was really bad, even though they had an Indian cook, but it was not edible. They could go to Wal-Mart and church on the company mini-bus, but when they came back they would be body searched and their bags would be searched. He was allowed to leave once a week.</p>
F429	January 27 2007	Flight from Mumbai, London, Miami, and then Texas.	Kavalamkuzhi, Signal employees in Orange, Texas	<p>Kavalamkuzhi flew to America, was taken to the Orange, Texas Signal Camp.</p>

F430	28-Jan-07	Orange, Texas	Mathew, Signal employees in Orange, Texas	Mathew began work at the Orange, Texas camp during this period. It was like a jail, with twenty four people sharing a container and workers referred to by their bed number. There were only two bathrooms in the trailer home, and a single small shower container. Sixteen of the twenty four men worked dayshift and were sleeping only four hours a day. Mathew paid \$245 per week for food and accommodations. The food was bad, and the water from the tap contained a yellow color out of the tap. Mathew had several stomach ailments as a result. Twenty four people shared a trailer, with just one emergency bathroom in the trailer and eight toilets and showers for all of the camp employees. Mathew heard about Indian workers in Mississippi who were put in jail for lack of documentation, heard about a suicide attempt at a Mississippi Signal plant, and heard that Signal would fire Indian workers first if there was not enough work.
F431	31-Jan-07	Flight to America	K. Varghese	K. Varghese flew from Mumbai to the U.S. after the rest of the group had already left.
F432	Late January 2007	In-person meeting in Mumbai	Kainikkeril; Sachin Dewan	Kainikkeril went back to Sachin Dewan’s office in Mumbai to collect his passport and pay the remainder of his money. Sachin Dewan was sitting with bags of money around him.
F433	31-Jan-07	In-person meeting, Mumbai participants	Sachin Dewan, Dewan’s bodyguard, Rodrigues	Rodrigues was pushed by Sachin’s bodyguard, resulting in an injury to Rodrigues’ neck. The bodyguards forced him to stamp his thumb on a document. He was required to make a final payment of 2 Lakh, bringing the total he paid to \$16,000.
F434	January 31 – February 1, 2007	Plane from Mumbai to Houston and bus to Orange, Texas	Rodrigues	Rodrigues traveled from Mumbai to London to Houston and then was taken by Signal personnel (including Ravi, the camp boss) to Orange, Texas by bus.

F435	January – October 2007	In person meetings, Orange, Texas	Singh, Signal employees including Ravi, other Indian workers	During this period Singh worked in Orange, Texas and lived at the “Man Camp” there. Conditions were deplorable. Sixteen men were in Singh’s trailer in bunk beds. There were not enough bathrooms. The food was bad and occasionally rotten. Only Indians lived in the camp, and security was tight. He heard about a worker, Sabulal Vijayan at the Mississippi camp, who tried to commit suicide because of the threats of deportation. Singh understood that if he created trouble, he would be deported.
F436	Feb-07	Orange, Texas	Biswas, Signal employees in Orange, Texas	Biswas flew to America, was taken to the Orange, Texas Signal Camp, and took another skills test, after which his pay was reduced to \$12 per hour. Foremen (Milton and Jason) told him he could either accept the reduced salary or leave.
F437	Feb-07	Orange, Texas	Biswas, Signal employees in Orange, Texas	Biswas worked for Signal beginning at this time. He lived in a container with bunk beds and no privacy. Biswas couldn’t sleep because he worked night shift. He was sick; got medicine from Wal-Mart. Food was unhealthy and bad; sometimes food was spoiled. Biswas paid \$245 per week for the food and accommodations. Biswas was told that he had to live there. Biswas felt he was treated differently from and worse than American and other ethnic workers.
F438	Feb-07	In person meeting	Manish Dewan, S. Dewan, Baki	Manish Dewan booked Baki’s flight to the United States, but Baki was required to pay 48,000 rupees for the plane ticket. S. Dewan demanded and took back all receipts and documents from Baki related to the payments Baki had made to Dewan. On February 1 or 2, 2007, Baki flew from Mumbai to Chicago and then to Houston.
F439	Feb-07	In person meetings, Houston and Orange, Texas	Ravi, Signal camp boss, other Signal officials and Indian workers	Baki showed up in Houston around midnight with around 40 other workers. They were met by the camp boss, Ravi, and the 40 of them were put into a van and taken from Houston to Orange, Texas.

F440	Feb-07	Orange, Texas	Kavalamkuzhi, Signal employees in Orange, Texas	<p>Kavalamkuzhi worked at the Signal Camp starting at this time. He lived in trailers or bunkhouses with 20 people to one building, very crowded. There was not enough space, it was always noisy, there was no room for personal belongings and only two bathrooms. The food was of poor quality and only served at certain times—sometimes Kavalamkuzhi missed meals because of his work on the night shift. He was required to pay \$245 a week for the accommodations. Kavalamkuzhi felt as though the American workers were treated better than the Indian workers—they were not required to live on-site like the Indian workers, and the Indian workers were constantly harassed and yelled at by the supervisors.</p>
F441	Feb-07	In person	Ponnan, Signal, Mike (the Signal supervisor)	<p>Ponnan starts working for Signal in Texas and lived in the trailer camp. In the labor camp, there were 20 people living in his trailer. The food was really bad Indian food and they did not have any other food options. They were charged \$35.00 per day to live in the labor camp. They did not have transportation to leave the camp. In order to leave they would have to inform the security people and would have to find their own way to get a ride. Signal would only provide them with transportation if they needed to do something related to their work papers. They were free to go to church but no transportation was provided. They were not allowed to have alcoholic drinks.</p>
F442	1-Feb-07	Work for Signal	K. Varghese, Signal employees	<p>K. Varghese worked at the Texas facility from February 1, 2007 through March 10, 2008. Living conditions were terrible. 23 people in one container, sleeping in bunk beds, very difficult to stay there.</p>

F443	February 2, 2007 through October, 2007	In-person meetings	Rodrigues, Signal employees, other workers	Rodrigues worked at the Signal Orange, Texas facility during this period. Living conditions were terrible. Around 16 people lived in the trailer with him. There were double bunk beds with only a foot between the beds and only one toilet inside. Workers in the trailer were on different shifts so sleep was impossible. The food was horrible. Rodrigues got sick and had stomach issues. Signal took \$250 weekly out of his paycheck. Rodrigues felt that the Indian workers were treated like prisoners, with the camp boss and the security coming into check beds and bags while they were sleeping.
F444	Feb-07	International travel	Kainikkeril, Signal	In February 2007, Kainikkeril traveled from Mumbai to the United States. He had connecting flights in both London and Chicago before arriving in Orange, Texas.
F445	6-Feb-07	Flight from Mumbai to Houston, arrival in Orange, Texas	Kannithi, Signal employees in Orange, Texas	Kannithi arrived in Houston on a plane with approximately 50 other hired workers, and was taken in the Signal bus from the airport to the Signal camp in Orange, Texas. Five days after his arrival, Kannithi began working as a structure fitter. Kannithi was paid \$19.50 per hour, but Signal deducted \$1,050 per month for room and board. The accommodations were horrible, with two stinking bathrooms. Kannithi had never seen so much misery before. The food was not fresh and at times it smelt. Kannithi and the other workers had no choice to eat it. It was very difficult to get sleep because of continuous disturbance because 20 people who lived there kept coming or going. Kannithi was afraid of going out for fear of snakes and other insects. Kannithi complained in meetings but there was no remedy. When he complained to the cook, the cook said he had to cook for such a large number of people and couldn't do any better.
F446	7-Feb-07	Telephone	A. Varghese, Salimon	Salimon contacted A. Varghese in February of 2007 about a second interview date with the consulate.

F447	10-Feb-07	In-person meeting, Chennai	A. Varghese, Salimon	A. Varghese attended a second consulate interview in Chennai and passed.
F448	13-Feb-07	Telephone	A. Varghese, Salimon	A. Varghese then got a phone call from Salimon telling him to go to a medical examination. He had to pay 2,800 rupees for the medical examination. Salimon then told A. Varghese that his flight was leaving on February 14. A. Varghese told Salimon that he was worried about bringing the remaining money all the way to Mumbai, but Salimon told him that he didn't care how A. Varghese brought the money as long as he had it.
F449	14-Feb-07	Mumbai	V. Babu, Sachin	V. Babu traveled from Kochi to Mumbai, where he had to pay 2 lakh 65,000 rupees before he got his passport, which he borrowed from family.
F450	14-Feb-07	Payment	A. Varghese, Salimon	A. Varghese paid a final payment of 4 lakh rupees in Mumbai.
F451	15-Feb-07	Air travel	A. Varghese	A. Varghese traveled to the United States via plane on February 15, 2007 at approximately 2 a.m.
F452	Mid-February 2007	In-person meeting, Orange, Texas	A. Varghese, Signal International	When A. Varghese arrived at the camp, the security guards searched his bags. Signal representatives then told him to fill out paperwork and sign up for a bank account. They then took him on a tour of the property, including the accommodations. The accommodations consisted of a trailer with bunk beds, with at least 15 people sleeping together in the same room. The beds were labeled with an identification number that Signal gave to each person. It was a tiny space. Signal did not tell any of the workers first, but then deducted \$245 from each individual's paycheck for food and housing. This had not been disclosed to A. Varghese while he was in India.
F453	15-Feb-07	Flight to America, Orange, Texas	Attayil, Signal employees in Orange, Texas	Pananjikall flew to America, arrived at Signal camp in Orange, Texas where he met Rao, the camp boss, and Tony, the foreman.

F454	Feb-07	Orange, Texas	Pananjiklal, Signal employees in Orange, Texas	Pananjiklal began work at the Orange, Texas camp during this period. He lived in a mobile home (intended for 4 people), but bunk beds were installed so that more people could fit in the trailer. \$500 per week was deducted from his paycheck. The worst thing was the food, which was the main reason he decided to leave. Food was poor in quality, as were living conditions. When the workers questioned their employer about the living conditions or the status of their visas, the workers were told either to accept the conditions or leave. He wanted to live outside the camp, but was told \$500 per week would still be deducted from his paycheck.
F455	February 15-16, 2007	Flight to America, via Mumbai, London, Chicago, and Houston to Orange, Texas	Veetil, Signal employees in Orange, Texas	Veetil flew to America, after overcoming immigration problems in London that necessitated a phone call to Signal, and was taken by Ravi from Houston airport to the Signal Camp in Orange, Texas
F456	February 14-15, 2007	Flight to America, via Mumbai, London, Chicago, and Houston to Orange, Texas	V. Babu, Signal employees in Orange, Texas	V. Babu traveled from Mumbai to London, Chicago, Houston, and then to the Signal Camp in Orange, Texas.
F457	February 2007 – March 2007	Orange, TX	V. Babu, Signal employees including Ravi Reddy	V. Babu did not work for the first month as he was told he failed the welding test, and was not paid. V. Babu believes that his passing test was given to someone else who failed the test on purpose, and that the foreman (Ricardo) discriminated against Indian workers.
F458	Feb-07	Orange, Texas	Veetil, Signal employees in Orange, Texas	Veetil began work at the Orange, Texas camp during this period. He was living in a container with more than 20 people. He was charged \$240 a week for food and the food was horrible.

F459	February 2007 – November 2007	In person meetings	Baki, Signal employees, other Indian workers	Baki worked in the Orange, Texas Signal camp from February 2007 through November 2007. Conditions were very bad. Approximately 16 people lived and slept in the crowded trailer in which he slept, which had eight bunk beds. The trailer only had two bathrooms, one inside and one outside and there were constantly long lines to use the bathroom. Meals were a big problem, because the camp would serve the previous day’s food for lunch and the food would spoil. Security was high at the camp, with guards checking Baki and the other workers whenever they came in. Signal deducted approximately \$300 per week in accommodation-related expenses, including \$245 for lodging and food and \$15 for medical care from Baki’s wages. Ravi and other camp personnel told Baki and other workers that if they left, they would be on their own and they would lose the possibility of getting a green card, so Baki did not consider leaving camp.
F460	February 2007 to October 2008	In-person meeting, Orange Texas	A. Varghese, Signal International	A. Varghese worked for the Signal camp in Texas for 7 months. He was then told that the Texas camp would not extend his visa, and that he had to go to the Mississippi camp.
F461	March, 2007	Cell phone calls, in-person meetings	Indian workers in Mississippi and in Texas, Signal employees	In March, James heard about an incident in the Mississippi camp, involving an individual named Sabulal where Sabulal had complained about conditions and Signal was attempting to deport him. Sabulal had tried to kill himself. James and the other workers in Texas were very afraid about this, realizing that it could just as easily happen to them.

F462	Approximately March 2007	Cells phones, in person meetings, Pascagoula, Mississippi Signal camp and Orange, Texas Signal camp	Signal employees, Baki and other workers in the Orange and Pascagoula camps.	Baki heard about an incident involving one Sabulal in the Mississippi Signal camp. Baki heard from co-workers in the Texas camp who had spoken with Mississippi workers that Sabulal had been threatened by Signal with deportation and that because he had a lot of debt, he had attempted suicide to avoid going back to India. Sabulal had complained about the food workers were served and the way they were treated. Baki understood that Signal wanted to get rid of Sabulal because he was complaining and getting other workers to complain and so Signal tried to send him back to India. Baki felt that the same thing could happen to him. Baki thought that Sabulal and the rest of the workers were treated as slaves and had no way out, so Baki felt trapped.
F463	15-Mar-07	In-person at Signal International Orange, Texas labor camp	Signal International representatives and upon information and belief Malvern Burnett to Indian H-2B Signal employees, including most or all plaintiffs.	Signal representatives and Malvern Burnett said that if Texas workers conducted activities “like the workers in Mississippi” they would be deported. They told the Indian H-2B Signal employees that they would apply for green cards for all of them.
F464	March 2007 – September 2007	Orange, Texas	V. Babu, Signal employees	V. Babu began working in March 2007. He paid \$35 per day for food and accommodations. The food was horrible and he got sick. He did not eat pork and beef but was served it anyway. If he attempted to leave the camp to shop for food, he had to wait for 10 people at the gate. If there were 10 people they would take people after 7pm, and gave them 1 hour in Wal-Mart. There were 19 people living in his trailer, with other day and night shift people living in the same space. He asked if he could leave the camp and Signal would not pay for his accommodations. In September 2007, Signal informed him there was no more piping work and there was no work in Mississippi, so he should look for work and leave on his own.

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F465	March 2007 to early 2008	In-person meeting in Mississippi	John and Signal representatives	John was transferred to the Signal camp in Mississippi in March 2007; he worked long hours as a ship/plate fitter, and did additional work cleaning the camp and the trailers. One day, John was told that his visa had not been renewed and that he had to leave the United States.
F466	April, 2007	In-person meeting, travel	Varkey, Ravi Reddy (Signal camp boss)	Varkey made an emergency trip back to India because his wife was ill. Reddy told him he could make the trip, but to do so in secret. While Varkey was in India, doing no work, Signal continued to deduct money from his paychecks for food and accommodations.
F467	Apr-07	In-person meeting	Baby; Signal representatives; other workers	Baby left Signal on his own, even after Signal representatives informed him and other workers that if they left they would be sent back to India.
F468	Apr-07	In-person meeting	Pottirayil, Signal representatives	After Pottirayil heard about the trouble in Mississippi—Signal representatives rounding up and isolating Indian workers who made complaints—and decided to leave. Also impacting his decision was that a Mexican national foreman at Signal informed him that several Indian nationals would be required to return to India.
F469	May, 2007	In-person meetings, Orange in Port Arthur, Texas	Varkey, Signal camp bosses and foremen	Varkey returned to the U.S. in May, 2007 and went to the Port Arthur job site, but was told there was no work for him there. The superintendent at the man camp told Varkey he would work at the job site at Orange, Texas, next to the camp. Varkey did that for a while, but the work was minimal and, with \$245 still getting deducted weekly from his paychecks, Varkey was making very little money.
F470	May, 2007	In-person meeting	James, Susan, the Personnel Manager at Signal’s Orange, Texas facility	James met with Susan and complained about a number of conditions, and asked about his green card. Susan said that green cards were not going to happen.

F471	June, 2007	In-person meeting, Orange, Texas camp	Varkey, camp boss	The camp boss told Varkey that his contract was up, and that his visa would not be extended, that he needed to leave the camp and that he would be given an airline ticket back to India. Varkey explained that he was supposed to get a green card, but the camp boss said he did not know anything about that. Varkey left the camp.
F472	June, 2007 or early July, 2007	In-person meetings, Orange, Texas camp	James, Signal employees	James became very depressed about having spent and borrowed all of the money he had and now being told there was no green card available and getting diminishing work opportunities with Signal. James packed his belongings and left the Orange, Texas camp. The guard asked James where he was going and James told him that he was taking a holiday.
F473	Jul-07	Orange, Texas	Pananjikal, Signal employees in Orange, Texas	Pananjikal found out that Signal was not proceeding with his permanent Visa (and wouldn't answer his questions about it). Signal told him it could proceed with his visa application, but there was not guarantee that he would receive a visa. Signal offered to pay his airfare home, so that's what Pananjikal did. Pananjikal didn't want to take the chance of staying in the U.S. and working illegally, as some of his co-workers did.
F474	Jul-07	In person	Ousephkutty, Signal	Ousephkutty received a letter saying workers' visas would be extended according to how hard they worked and their attitudes. He would have gone somewhere else to work, but he had already paid so much money to come to the United States.
F475	26-Jul-07	Mail, fax, or electronic mail (wires)	Darrell Snyder to United States Citizenship and Immigration Service's Vermont Service Center	Darrell Snyder signs H-2B extension letter to USCIS's Vermont Service Center stating that the foreign workers would work for a specified period of time, receive the prevailing wage, and return to their home country at the end of the period.
F476	31-Jul-07	Orange, Texas	Attayil, Signal employees in Orange, Texas	Attayil is fired by Signal. He was told there was no more work and he should go find another job.

F477	July 2007 through August 2007	Orange, Texas	Ousephkutty, Ravi, Signal employees in Orange, TX.	Ousephkutty lived in a trailer with 23 people; 2 toilets; 3 showers with no curtains, just open. He could not sleep because there were two shifts living in the trailer, so people would be coming and going while others were trying to sleep. The food was very cheap and very bad. Ravi was appointed by Signal to watch the camp. There was a fence surrounding the property, and they could not leave unless they left with security to go to Wal-Mart. He was allowed to leave maybe once or twice a week, but sometimes he had to wait up to a month. No alcohol was allowed. Security would search their bags and would confiscate any beer or alcohol. Some workers looked into living elsewhere, but Signal would still have deducted \$350 per week regardless. Three or four people went to live in an apartment, but came back because they still had to pay the same weekly amount.
F478	July 2007 – January 26, 2008	Worked in Mississippi	Raghavan, Signal	Raghavan worked in the Mississippi camp with no visa. He complained to the camp boss about not having a visa who said there was a mix-up over which camp (Mississippi or Texas) would do the paperwork.
F479	2007	In-person meeting, Orange, Texas	Kakkanthara, Signal representatives	When Kakkanthara’s review came around, they told him that Signal would not be renewing his visa because he had too many absences. He tried to show them the papers from his doctor visits, but they did not care. He was informed that Signal would arrange for his travel back to India.
F480	Aug-07	In person	Venugopal, Signal	Signal told Venugopal that it would not renew his Visa. He left Signal as a result.

F481	August 2007 – July 2008	In person	Ponnan, Signal, Haught	Ponnan began working for Signal in Mississippi. During this time, Signal told him that his green card was in process and he stayed at Signal because he did not want to jeopardize his ability to get a green card. While in Mississippi, his supervisor (Haught) ordered him to complete three days worth of work in one day. If the work was not completed, his Signal supervisor punished him by not allowing him to work the next day without pay while still charging him \$35.00 per day to live at the trailer camp. He complained about the working conditions to his supervisor, but was treated worse after he made his complaints. He left Signal in July 2008 because he never received the green card that he was promised.
F482	Oct-07	In-person meeting, Orange, Texas	Devassy, Signal International, J&M	Devassy worked at the camp for approximately one year. In October 2007, however, J&M called. A lawyer (possibly named Ram C. Chiras) contacted them and said that they would have better living and working conditions with J&M. The lawyer also promised that they would file for a green card for him. He chose to go work for J&M.
F483	October, 2007 – March 2008	In-person meetings, Pascagoula, Mississippi	Rodrigues, Signal employees, other workers	During this period, Rodrigues worked in Signal in Mississippi. Conditions were also very bad there.
F484	October 2007 – December 2008	In person meeting, Pascagoula, Mississippi	Singh, Signal employees, other workers in Mississippi	In October, Singh was transferred to the Mississippi camp, where the living conditions were equally as bad as in Texas.
F485	November 2007 – March 2008	In person meetings, Pascagoula, Mississippi camp	Baki, Signal employees, other Indian workers	Baki during this period worked at the Mississippi camp, where conditions were also very bad. There were weekly meetings in the Mississippi camp where the security guard, Ramesh, threatened to call immigration on the workers and have them deported if they tried to leave camp.
F486	Dec-07	Orange, Texas	Kakkoth, Signal employees in Orange, Texas	Kakkoth was told by Signal that jobs were scarce and that he could go look for other work, but that Signal would not be responsible for him.

F487	Dec-07	Call from public telephone at Signal International Orange, Texas labor camp to law office of Malvern C. Burnett (wires)	Signal employee to representative of Malvern C. Burnett	Telephone call to schedule meeting with Malvern C. Burnett. The receptionist explained that any Signal employee attending the meeting would have to pay \$100 each to meet with Malvern. Burnett.
F488	Jan-08	Mississippi	George, Signal employees in Mississippi	George moved to the Signal camp in Mississippi after one year and worked there for 6 months. After that Signal told him it could not renew his H2B visa and fired him.
F489	January 2008-October 2008	In-person meetings, Pascagoula, Mississippi	S. Babu, Signal employees, other workers	S. Babu was sent to the Mississippi facility and worked there until October 2008. The living conditions and food in Mississippi were even worse than in Texas.
F490	January 2008 through November 2008	In person	F. Joseph, J&M	F. Joseph was told that he had to leave Signal and go work for J&M in Tampa because his work permit was through J&M, so he went to work for J&M. J&M withdrew his T-visa.
F491	Feb-08 (approximately )	Orange, Texas	Kannithi, Signal employees in Orange, Texas	Kannithi was informed there was no more work at Signal and he could go to Mississippi, but Kannithi had heard reports that the food in Mississippi was even worse.
F492	Feb-08	In-person at Signal International Texas, Orange labor camp	Ravi on behalf of Signal International, Signal employees	Meeting. The workers were told that they would be moved to Signal International's Pascagoula, Mississippi facility, and that their wages would be reduced by \$3.70 per hour. The Signal International representative also delivered to the workers a letter describing the changes.
F493	Mar-08	Orange, Texas	Madhavan, Signal employees in Orange, Texas	Madhavan worked at the Orange Signal Camp until March 2008 when he was told there would be no more work.
F494	Mar-08	Mississippi	Mathew, Signal employees in Mississippi	Mathew was sent to Signal's Mississippi camp to work for three months, and was told there was a place there for his visa to be renewed.
F495	Mar-08	In-person in Mississippi	Kainikkeril; Signal employees	In 2008, Kainikkeril was transferred to the Mississippi Signal camp, where life was the same if not worse.
F496	10-Mar-08	Move to Mississippi	K. Varghese	K. Varghese was moved from Texas to Mississippi because Signal needed good, experienced workers in MS. When he was moved, he was promised a green card by a female lawyer.

F497	11-Mar-08	Work in MS	K. Varghese	K. Varghese worked in MS camp from March 11, 2008 through July 18, 2008. Then he was given a letter indicating that his visa would not be renewed and Signal did not extend his H2B visa.
F498	March 14, 2008 – December 2008	Pascagoula, Mississippi	Peruvelil, Signal employees in Pascagoula, Mississippi	Peruvelil moved to the Signal camp in Mississippi. Again there were 22 people living in the same container. There were 300 people. There was one bathroom for each container. There were 2 containers with 10 bathrooms each and it was for the whole camp. It smelled a lot. \$245 was deducted for his accommodations in both camps. He had no transportation or license to leave. He went out on the company van. He was checked by security for alcohol. He did feel that there were discriminatory acts towards him. A foreman indicated that he did not know how to work and that he would be sent back to India. The foreman’s name was Terry.
F499	Jun-08	Mississippi	Mathew, Signal employees in Mississippi	Mathew was told his visa would not be renewed and he left Signal’s employment.
F500	Jul-08	In-person meetings; Mississippi	Kainikkeril; Signal employees	Kainikkeril was informed that his visa extension had not been approved, and was asked to leave the Signal camp.
F501	October 2008 to December 28, 2008	In-person meeting, Mississippi	A. Varghese, Signal International	A. Varghese went to the Mississippi camp and worked there until December 28, 2008. Both camps were terrible. The Mississippi camp was very strict with security. Guards searched a worker's belongings when he went out. Food conditions were terrible. If he wanted to leave the camp, he had to wait at the security gate for a bus to leave. He had to return with the bus. In December 2008, Signal told the Indian workers that they would have to go back to India.